



1770 NE Fuson Road
Bremerton, Wa 98311

March 22, 2022

Re: Docket TV-210812 & TV210535

Response to Questions posed for Consideration

Received
Records Management
03/22/22 15:43
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

1. a. No
b. On the 91st day
c. SIT should remain at 90 days SIT should remain unchanged; converting a shipment from SIT to Perm Storage is an arduous task and can be expensive for the consumer and storage facility

d. Yes,
Storage-in-Transit is a move defined in the UTC HHG Tariff No. 15-C ITEM 100 as one continuous move from origin to SIT to the final destination providing necessary valuation at the customer's choice from pick-up through delivery to the customer. In other words, responsibility for the shipment remains with the HHG carrier until final delivery is made
The Intrastate HHG Tariff No.15-C contains rates, terms and conditions for the transportation of HOUSEHOLD GOODS between points in the state of Washington. The Intrastate HHG Tariff 15-C contains detailed procedures for how to assess charges for a HHG shipment going into and out of Storage-In-Transit, adding or removing items from Storage-In-Transit, and/or a change in ultimate destination from that shown on the original Bill of Lading.
2. No,
a. UTC HHG Tariff No. 15-C ITEM 102 was negotiated by UTC staff, WMC and its members, and interested commercial storage businesses. The intent of this Tariff ITEM is to provide customers a convenience for storage of a limited number HHG items that take up space at the customer's residence when not in everyday use. Items could include such things as golf clubs, water skis, snow skis, clothing items not regularly used, small household items the customer may want to hold on to for future use by family members when they move out of the house.

Small goods transportation is limited to 25 household good articles or a maximum of 500lb from each customer per week. For purposed of small good the description of what may transported is limited to what one person can carry.

The contract of small goods is simple since it covers transportation on form origin to a storage facility. The Uniform Household Goods Bill of Lading is inclusive for all services between residence and destination including, but not limited to packing, unpacking, storage 3rd party services.

3. No

a. The intrastate transportation of HHG in a local move or mileage rated move is a complex, labor intensive, activity. The intrastate HHG Bill of Lading presented to the customer when job is completed contains the charges for Hourly Rated moves that include vehicles used, HHG carrier personnel Start and Stop Times including required rest breaks, and third-party services if required. For local moves, the start time begins when –

When the HHG carrier's vehicle leaves the carrier's terminal or other location of the vehicle (whichever is closest) to the origin of the shipment, until the time the vehicle returns to the carrier's terminal or is dispatched to another job. O

The HHG carrier may charge Flat travel time for the time from the carrier's terminal or other location of the vehicle (whichever is closest) to the origin of the shipment and the time from the shipment's destination to the carrier's terminal.

The use of the 15-minute increment in billing for transportation of HHG is a reasonable time for charging purposes when transporting HHG.

b. No - refer to above

c. No

4. No

Rates and charges under HHG Tariff No. 15-C ITEM 230(7)(a)(ii) are provided at the customer's request and if the HHG carrier agrees to do the move at other than regular business hours, increased business costs will occur. In addition, Local Move jobs typically take longer than just one hour. Just the drive time from the carriers terminal to the customer's residence could take up to an hour and then there is travel from origin to destination and back to terminal.

5.

a. No

b. Will need to provide information at a later date.

6. Regarding maximum tariff levels for goods and services –
 - a. No they are NOT reasonable just look at inflation we should not have to wait for the UTC to decide we are allowed a rate increase there should be NO Maximum price set. Carriers will adjust their price according to supply and demand. Our pricing needs to be able to be adjusted on demand, not waiting excruciating months or longer for approval.
 - b. The Commission and UTC should remove themselves for dictating rates and focus on consumer protection rules only.