

Date Received: November 2, 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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October 30, 1998

78545.100

VIA FACSIMILE

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

Re: Household Goods Rulemaking Docket No. TV-971477

Dear Ms. Washburn:

This is now to attach previous comments filed in the record by Door to Door Storage in support of the above rulemakings definition of household goods at WAC 480-15-020.

As we have in previous stages of this proceeding, Door to Door Storage, Inc. strongly supports the definition set forth in the latest September 21, 1998 proposed rule circulation and will not here reiterate the legal and practical rationale for support of that rule. Suffice it to say that as the record reflects, we believe the proposed regulation is fully consistent with previous law and rule of the Commission, and more importantly, in full concert with Governor Locke's Executive Order 97-02, and the Commission's charge in promulgating this rulemaking in reviewing existing regulation in the wake of far-reaching changes to the transportation industry and regulatory structure affecting it.

Please contact me if you have further questions on this matter.

Very truly yours,

WILLIAMS, KASTNER & GIBBS PLLC



David W. Wiley

DAV:psb

s2-601871.1

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October 30, 1998

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Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504

Re: Household Goods Rulemaking Docket No. TV-971477

Dear Ms. Washburn:

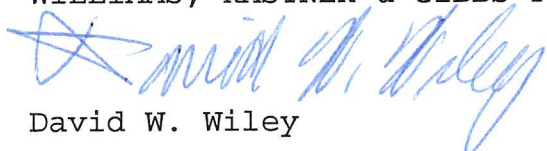
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WILLIAMS, KASTNER & GIBBS PLLC



David W. Wiley

DAV:psb

s2-601871.1

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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
August 4, 1998
Page 2

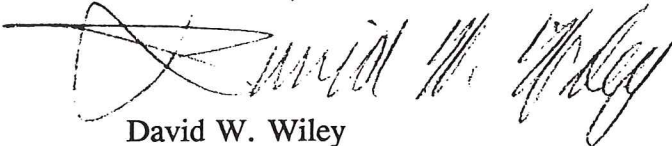
provided by the carrier in connection with the transportation of the container.

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

A handwritten signature in cursive script, appearing to read "David W. Wiley", is written over a horizontal line.

David W. Wiley

DAV:psb

cc: Door to Door Storage, Inc.