

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PROOF OF SERVICE

DOCKET NO.TV-971477

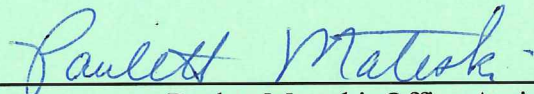
KNOW ALL PERSONS BY THESE PRESENTS That the undersigned, an employee of the Washington Utilities and Transportation Commission at Olympia, Washington, hereby certifies that a copy of the document referred to below was served on the parties of record in said proceeding in the following manner:

On the 19th day of October, 1998, a true copy of PATSY DUTTON LTR. TO JAMES R. TUTTON RE: ANSWERS TO MR. TUTTON'S QUESTIONS.

in the above-entitled cause now pending before the Commission was enclosed in an envelope addressed to each of the parties of record as set forth below. Each envelope was addressed to the address shown in the official files attached hereto, sealed with the required first-class postage thereon, and deposited on said date in the United States mail in the City of Olympia, County of Thurston, State of Washington.

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001390

Date Received: October 19, 1998

Docket No.: TV-971477

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

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James Tutton	(253) 838-1650	(253) 838-1715



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STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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VIA FAX AND U.S. MAIL

October 19, 1998

Mr. James R. Tutton
Washington Movers Conference
930 South 336 Street, Suite B
Federal Way, WA 98003-6384

RE: TV-971477 - Household Goods Rulemaking

Dear Mr. Tutton:

Thank you for your October 9 letter requesting information concerning Commission Staff resources and the staff's intent regarding special compliance audits as proposed in WAC 480-15-300.

Question: "Does the Commission staff intend to conduct "special compliance audits" on new entrants either during the six month provisional period of the temporary authority or at the conclusion of the provisional period but before the issuance of permanent authority?"

Answer: Staff does not expect that every recommendation for permanent authority will require a complete safety and economic compliance audit. Prior to making a recommendation to either approve or deny authority, staff will conduct a full review of the carrier's operations under the temporary permit. This review will include customer surveys, complaints investigated, reports of training and technical assistance provided, equipment inspections and all other information available. Based upon this review, staff will determine what level of audit or technical assistance is necessary.

Staff's goal is to work with new entrants to help them succeed. Each new entrant will be required to participate in formal training on tariff and safety requirements or sign an affidavit that states the company and its employees are fully trained and knowledgeable in the subject area. One-on-one technical assistance will be provided as needed. Staff proposes to offer the formal training to existing permitted carriers as well.

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Mr. James R. Tutton
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Question: "Does the Commission have sufficient staff available to (1) provide the educational and technical assistance to new entrants as proposed, (2) conduct the special compliance audits necessary, and (3) provide enforcement of the laws and rules relating to proper conduct when operating and providing service as a properly permitted household goods carrier?"

Answer: Yes, the Commission has sufficient staff to provide education and technical assistance to new entrants and existing carriers, to conduct special audits of those carriers that need them and, to enforce the laws and rules.

An internal team is developing the procedures for these technical assistance and compliance programs. Following is a draft outline you may find interesting:

I. Education and Technical Assistance

Staff will provide classroom style training covering safety and economic (including tariff) requirements. Formalized training can be scheduled and provided to groups of new entrants as well as existing companies. Depending on need, our current plan is to offer this training in Olympia on a monthly basis.

II. Compliance audits

Special compliance audits will be assigned and conducted based in the following priorities:

1. Public Safety Hazards
2. Consumer Protection
3. Unfair Business Practices
4. Administrative Requirements

III. Enforcement

We currently investigate a wide range of consumer and company complaints, including reports of illegal companies. We also have a team that is reviewing our procedures for enforcement issues with illegal carriers and how we provide technical assistance and enforce through use of administrative penalties.

I hope this information is useful. If you have questions, please let me know.

Sincerely,



Patsy J. Dutton
Assistant Director - Operations

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