

1 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
2 **IN AND FOR THURSTON COUNTY**

3
4 **WASHINGTON MOVERS**)
5 **CONFERENCE, a domestic non-profit**)
6 **corporation; CENTRAL MOVING &**)
7 **STORAGE, L.L.C., organized under**)
8 **Washington law; MORRISON MOVING**)
9 **& STORAGE CO., INC., a domestic**)
10 **corporation,**)

11 **Petitioners,**)

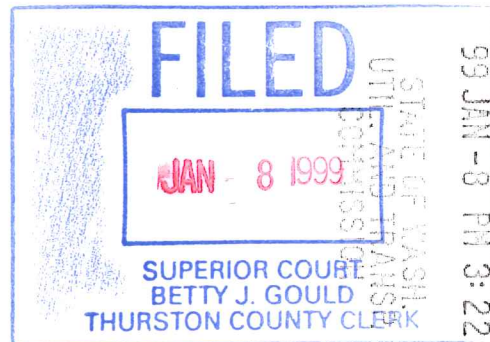
12 **v.**)

13)
14 **WASHINGTON UTILITIES &**)
15 **TRANSPORTATION COMMISSION, an**)
16 **agency of the State of Washington,**)

17)
18 **Respondents.**)

No. 99 2 00038 0

**DECLARATION OF
DAN HANSEN IN
SUPPORT OF STAY**



19
20 **I, Dan Hansen, declare:**

21 **1. I am a co-owner of Central Moving & Storage, L.L.C. and**
22 **hold operating authorities (permits) from WUTC which authorize my**
23 **firm to move household goods in Mount Vernon and Bellingham,**
24 **Washington. I am competent to be a witness in this proceeding and**
25 **am authorized to speak on behalf of Central Moving & Storage. All**
26 **facts are based upon my personal knowledge.**

DECLARATION OF DAN HANSEN - 1

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1 **2. Central Moving & Storage was in the household goods**
2 **moving business for many years prior to its purchase by my father Carl**
3 **S. Hansen in 1971. The purchase price included a WUTC operating**
4 **authority which was then valued at \$2,500.00. After my father's**
5 **retirement in 1995, Central purchased local cartage operating**
6 **authority for Bellingham for \$10,000.00 (no other assets were**
7 **involved). Our purpose was to expand our business into Bellingham**
8 **and, in order to lawfully do so, it was necessary to acquire an**
9 **operating authority from WUTC. Central's two operating authorities**
10 **are now combined and have a present value of \$30,000.00.**

11 **3. WUTC's lowering of entry standards coupled with statewide**
12 **territorial expansion of authority for new entrants will reduce the value**
13 **of Central's combined permit to the cost of an application (zero).**

14 **4. WUTC's ^{repealed DH} ~~present~~ regulations limited entry and established**
15 **rates and charges via Tariff No. 15. This directly influences the**
16 **structure of our business. In 1997 and 1998, Washington intra and**
17 **local moves contributed an average of 22% to our gross. Employees'**
18 **wages, benefits, and volume of work are directly affected by the rates**

DECLARATION OF DAN HANSEN - 2

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1 and charge required by WUTC Tariff No. 15. With the proposed change
2 to banded rates and binding estimates, along with relaxed permit
3 standards, our volume and profitability of business will definitely be
4 reduced. This, in turn, will reduce employee hours, benefits (due to
5 qualifying hours for health benefits), and wage increases. We currently
6 have 8 full time crew members with full benefits, who also have
7 families and homes in our community. They will be adversely affected
8 by the loss of business. Vehicle maintenance and replacement will
9 also be adversely affected. Less profit means less capital investment.

10 5. WUTC's exclusion of transportation of self-storage
11 containers containing household goods will also reduce our company's
12 volume and profitability. There are approximately three times the
13 number of self-storage facilities as moving companies in our
14 community. I conservatively estimate a 15% loss of local work. For
15 example, we would have experienced losses of \$28,683.00 in 1997 and
16 \$32,100.00 in 1998 if the exclusion had been in effect. Such losses
17 would continue and probably expand in the future.

DECLARATION OF DAN HANSEN - 3

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1 **6. Approximately three years ago, I began to run into**
2 **competition from illegal moving companies who were not licensed by**
3 **WUTC. The illegal movers did not abide by WUTC tariffs, territorial or**
4 **route limitations or regulations. Bellingham Moving Services, Moving**
5 **Solutions, Inc., Student Movers, and All-Phase Moving are unpermitted**
6 **illegal movers who do not abide by WUTC regulations. They compete**
7 **with my company in Bellingham and Mount Vernon. Central lost a**
8 **number of moves due to underbidding (below the tariff rate I was**
9 **required to charge).**

10 **7. Central Moving & Storage has been an active member of its**
11 **community for 28 years. We donate money, time, and services to the**
12 **“Festival of Trees” Hospital Foundation, Special Olympics, local Fire**
13 **and Police departments, and local schools. We provide good paying**
14 **jobs and benefits to 18 full-time employees and 5 part-time employees.**
15 **We are making payments on a 24,000 square foot warehouse facility**
16 **along with numerous trucks and equipment. WUTC’s proposed**
17 **rulemaking changes will upset the economic structure this business**
18 **has adapted to. We will be forced to a new market structure. The new**

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1 **untested and untried market structure will reduce community**
2 **involvement, employment, and moving facilities and equipment due to**
3 **reduced revenues and profitability. Central Moving & Storage may well**
4 **not be able to continue to operate successfully in that environment.**

5 **8. I declare under penalty of perjury under the laws of the**
6 **State of Washington that the foregoing is true.**

7 **Signed this** 10th **day of January, 1999 at Mount Vernon,**
8 **Washington.**

9
10
11
12
13 by Dan Hansen

14 **Dan Hansen**

*by jlc
per telephone
authorization*

DECLARATION OF DAN HANSEN - 5

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13 **value of Central's combined permit to the cost of an application (zero).**

14 **4. WUTC's ^{repealed} ~~present~~ regulations limited entry and established**
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16 **structure of our business. In 1997 and 1998, Washington Intra and**
17 **local moves contributed an average of 22% to our gross. Employees'**
18 **wages, benefits, and volume of work are directly affected by the rates**

DECLARATION OF DAN HANSEN -2

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1 new untested and untried market structure will reduce community
2 involvement, employment, and moving facilities and equipment due to
3 reduced revenues and profitability. Central Moving & Storage may
4 well not be able to continue to operate successfully in that
5 environment.

6 8. I declare under penalty of perjury under the laws of the
7 State of Washington that the foregoing is true.

8 Signed this 7th day of January, 1999 at Mount Vernon,
9 Washington.

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12
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14
15

Dan Hansen

DECLARATION OF DAN HANSEN -5

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