

March 24, 2000

Re: Docket No. TV-991559, Chapter 480-15 WAC

Thank you for the opportunity to file written comments to Docket No. TV-991559, Chapter 480-15 WAC.

The new discussion draft, "Review of Rules Relating to Household Goods Carriers", dated March 10, 2000, really does clarify a number of issues and, if adopted, will provide consumers with rules necessary to insure HHG moving services requested are provided by accountable HHG carriers at reasonable rates and charges.

In addition, participating HHG carriers holding valid HHG Permits could then expect, through the new open, yet controlled, entry rules, that the commission staff would exercise appropriate enforcement against illegal HHG movers and achieve justice both through administrative AND judicial processes.

One clarifying definition lacking, however, in WAC 480-15-020 is that which defines a self-storage container that is discussed within the proposed definition of "Household Goods".

I would strongly recommend the following addition to WAC 480-15-020 Definitions:

(?) "Self-Storage Container" means an easily accessessable, weather tight container, without wheels, not exceeding 280 cubic feet (5'W x 7'L x 8'H) of usable storage space capable of being self-locked by the customer.

The reason for this additional definition is simple. The agreed upon intent of the newly proposed "Household Goods" definition is to segregate permitted HHG movers who provide motor transportation of property, residence to residence or residence to storage and then to a new residence, requiring a HHG Permit; from the typical self-storage business which would allow the motor transportation of customer packed self-storage containers from the residence to their storage facility based upon a self-storage agreement executed in good faith without the need for a HHG Permit.

Defining the customer packed self-storage container would strengthen the intent of the proposed Household Goods definition and preclude anyone's attempt to circumvent the regulation of Household Goods by dropping a truck or a 20', 35' or 48' enclosed trailer at a customers residence, allowing the customer to load the truck or trailer, lock it, and have it later retrieved and transported to a storage facility. Under the guidelines of the proposed definition of Household Goods, the storage period could be one day, 10 days or 90 days. If the customer requested storage period was for just a few days, the goods could be left on the truck or trailer and easily transported back to the old residence or to a new residence; an activity that would be outside the scope of the household goods regulations. This sort of activity would provide illegal movers an opportunity to operate

a business that would be difficult to enforce and certainly detrimental to both regulated household goods movers and legitimate self-storage operators who offer the service of delivery and pick-up of customer packed self-storage containers.

I contacted two self storage activities, Door To Door Storage and Public Storage, for the size of their customer packed self-storage containers. Both provided the same size containers described above for this type of service.

Thanks again for the opportunity to provide written comments.

Jim Tutton
Vice President