

March 30, 2000

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VIA E-MAIL AND FIRST CLASS MAIL

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

22948-0001

Re: Commission Docket No. TV-991559, Discussion Draft Household Goods Carrier Rules, dated March 10, 2000

Dear Ms. Washburn:

On behalf of my client, Public Storage Pickup and Delivery, L.P. (PSPUD), I am writing to indicate conditional acceptance of the revised definition of “household goods” at WAC 480-15-020(14). PSPUD finds that the proposed revised definition adequately maintains the current and historical regulatory exception of the transportation of containerized household goods to and from a self-storage facility.

PSPUD’s acceptance, however, is expressly conditioned upon elimination of the term “public” from the last sentence of the definition. The term “public storage” is a federally registered trademark of Public Storage, Inc., which licenses use of the name and mark to PSPUD and other related affiliates. Accordingly, PSPUD suggests that the word “public” be replaced with “self-”. The last sentence of revised definition should read:

The term excludes transportation of customer packed and sealed self-storage container that are delivered to and from a ~~public~~ self-storage facility, when that transportation is provided in conjunction with a self-storage agreement executed in good faith, and when no accessorial services are provided by a motor carrier in connection with the storage or the transportation of the container.

PSPUD appreciates this opportunity to comment on the discussion draft and remains committed to working with WUTC Staff and other interested parties as the rulemaking

process continues.

Very truly yours,

Todd G. Glass

cc: Public Storage Pick-up and Delivery, L.P.
David W. Wiley, Esq.
Chris MacKay, Esq.