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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

August 7, 2007

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Ms. Carole J. Washburn
WUTC Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

Re: *Rulemaking to Revise Household Goods Carrier Rules WAC 480-15*
Docket No. TV-070466

Dear Ms. Washburn:

In response to the recent Notice of Opportunity to File Written Comments to the draft rules, this is to provide specific comments on behalf of Door to Door Storage, Inc., CC-57953. Since a January 9, 1996, informal staff opinion regarding its proposed operations, Door to Door Storage has operated in Washington intrastate commerce as a general commodities carrier. Under existing WAC 480-15-020, the transportation of containerized household goods which are customer packed and sealed is exempt from the definition of regulated household goods. With the interlineation in the July 20th proposed revisions to WAC 480-15, that exemption from the household good definition is effectively removed.

On behalf of Door to Door Storage, Inc., we would ask that the historic exclusion in the definition of household goods either be maintained or that a new section entitled "Exempt Operations" or its equivalent be drafted to memorialize the continued exclusion of containerized household goods transportation from the definition and traditional regulatory regime of residential household goods in the State of Washington. In the prior household goods rulemaking in 1998, we submitted considerable argument about the need for the exclusion and I will not here repeat that except to indicate that the undersigned and Door to Door Storage are available to staff and/or the Commission to articulate additional rationale for supporting the continued and well-reasoned exclusion of containerized household goods from the traditional residential household goods definition.

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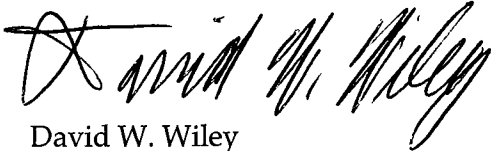
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Thank you for your attention to this matter and we look forward to working with the staff to finalize language maintaining the exclusion in the present rulemaking.

Yours truly,

A handwritten signature in black ink, appearing to read "David W. Wiley". The signature is written in a cursive style with a large initial "D" and "W".

David W. Wiley
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cc: Bill Simonson
Eric Ryden