

1300 S. Evergreen Park Drive SW P.O. Box 47250

Olympia, WA 98504-7250 Phone: 360-664-1222

Fax: 360-586-1181 TTY: 360-586-8203

or

1-800-416-5289

email: transportation@utc.wa.gov

# HOUSEHOLD GOODS MOVING COMPANY PERMIT APPLICATION

FOR OFFICIAL USE ONLY			
Date Filed:	DOL/SOS:	ID:	Docket #
Staff Assigned	Insurance	Inspection	Permit Issued THG-
Reception #	111-0268-207-02	111-0268-013-20	

Type of F	ouseno	id Goods Authority	<u>/ Requested – check one</u>	<u>ree Kequirea</u>						
Provision permane	Provisional and permanent authority. The fee for provisional, and then permanent authority is a one-time fee. Complete pages 3-8 and Attachment A.									
interest (	Permanent authority to transfer resulting in a change in ownership or controlling interest (at least six months must be served on a temporary provisional basis).  Complete pages 3-8, Attachment B as well as a closing annual report									
	Permanent authority to transfer under the exceptions in WAC 480-15-187. Complete pages 3-8 and Attachments B & C.									
on criteri	Reinstatement of permit (must be filed within 30 days of cancellation, depending on criteria set forth in WAC 480-15-450). Complete pages 3-5 and include a statement justifying the reinstatement.									
□ Name Cha	ange – Con	nplete pages 3-5 and Atta	chment D.	\$ 35						
		BUSINESS I	NFORMATION							
Legal Name:		Dolly Apple, Inc								
Trade Name, if a	oplicable	Dolly								
Physical Address 901 5th Avenue, Suite 600, Seattle WA, 98164										
Mailing AddressSAME										
Telephone Number ( ) Fax Number ( )			833-817-6581							
	c. ( )									

BUSII	NESS INFORMA	ATION - c	ontinued		
Is your business registered with the D	epartment of Rev	<u>venue</u> ? □	No 🛮 Yes	5	
UBI #:		USDOT #:	N/	A See Attachment E	
If you currently do not have a USDOT apply or call 360-596-3812 for assista		ie at <u>www.</u>	fmcsca.dot	t.gov/online-registration to	
Department of <u>Labor &amp; Industries</u> (L&	دا) Worker's Comp	account #	336	,381-00	
Employment Security Department (ES	SD) registration #		00005	52720000	
If you will not be setting up an account with L&I or ESD because you do not have employees, please explain how you plan to obtain workers. Per <u>WAC 480-15-555</u> , a criminal background check must be completed on each person you intend to hire. If you intend to hire day labor from a temp agency, they must perform the criminal background check. Refer also to <u>WAC 480-15-302</u> and <u>305</u> .					
		-			
TY	PE OF BUSINES	SS STRUC	TURE		
☐ Individual ☐ Partnership ☐	☑ Corporation	□ Other	(LP, LLP, LLC)	State of Incorporation_DE	
List the name, title and percentage of	partner's share o	r stock dis	tribution fo	or major stockholders:	
Name Dolly, Inc	<u>Title</u> Parent		St	ock Distribution or % of Shares	
	-				
Must provide a copy of a valid driver's lie named in the application.	cense or governme	ent-issued p	hoto identi	fication card for each person	
Describe the services you wish to promote competition, or fill an un Dolly is an app-based marketplace which connects c (called "Helpers") who want to do the transportation fhousehold goods carriers don't service thereby expansimilar service operating in WA state (Lugg.com) so I	nmet need for services and business or them. Dolly enables and business or them.	vice:_ es that have lo people to get l ces available to	ocal goods tran nelp with on-de o WA state resi	sportation needs with local truck owners mand, micro-move tasks that existing dents. In addition, there's only one other	
2. Briefly describe your experience in	n the transportati	on/househ	old goods	moving industry:	
Dolly has been providing this service	in 6 other markets	s, some for	r as long as	s 3 years.	

7-2017

3	<ul> <li>Do you currently hold, or have you ever held, a permit to operate as a motor carrier of property?</li> <li>✓ No ☐ Yes If yes, please indicate your permit number</li> </ul>				
4.	. Have you ever applied for and been denied a p Washington? ☑ No ☐ Yes If yes, please exp	ermit to operate as a mot lain	or carrier of property in		
5.	Do you currently operate interstate? ☑ No ☐ Y	es If yes, please indicate y	our MC#		
6.	Do you operate interstate as an agent of anothors, what is the name of the company?	er company? ☑ No □ Ye:	S		
7.	Do you have, or have you ever had a business-ror in any other state? ☐ No ☑ Yes If yes, plea	elated legal proceeding ag se list below:	gainst you in Washington		
	Type of Legal Proceeding	Date	State		
	UTC Staff Investigation	January 2018	WA		
		tunidary 2010	WA		
8.	Has any person named in this application ever b burglary, assault, sexual misconduct, identity the sale, or distribution of a controlled substance?	eft, fraud, false statement	s or the manufacture		
	Type of Conviction	Date	City/State		
-					
9	*attach additional pages if necessary				
J. 	Has any person named in this application, been or rules? ☐ No ☑ Yes If yes, please list below:	ited for violation of state	laws or Commission		
_	Violation	Date	RCW/WAC		
Op	perating and advertising as a HHGC, SWC, and CC without permits	May 2018	RCW 81.80.070, 355, and 81.77.040		
	*attach additional pages if necessary				

See a Hacked

### FINANCIAL STATEMENT

Complete the following financial statement or attach a balance sheet, profit and loss statement, or business plan.

Assets		Liabiliti	Liabilities				
Cash in Bank	\$	Salaries/Wages Payable	\$				
Notes Receivable	\$	Accounts Payable	\$				
Investments	\$	Notes Payable	\$				
Other Current Assets	\$	Mortgages Payable	\$				
Prepaid Expenses	\$	TOTAL LIABLITIES	\$				
Land and Buildings	\$	NET WORTH					
Trucks and Trailers	\$	Preferred Stock	\$				
Office Furniture	\$	Common Stock	\$				
Other Equipment	\$	Retained Earnings	\$				
Other Assets	\$	Capital	\$				
TOTAL ASSETS	\$	TOTAL LIABILITIES & NET WORTH	\$				

# Pescribe the equipment you will own or lease to provide moving services (attach additional sheets if necessary). Year Make License Number Vehicle ID Number Gross Vehicle Weight

# dolly

Dolly, Inc. | 901 5th AVE, Suite 600, Seattle, WA 98164 | 206.494.3198

July 13, 2018

### VIA EMAIL

Mr. Michael Dotson Transportation Specialist Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW P.O. Box 47250 Olympia, Washington 98504-7250

RE: Household Goods Carrier Permit Application Financial Resources Requirement

Dear Mr. Dotson,

Please accept this letter as satisfaction of the proof of financial viability requirement found in Washington Administrative Code ("WAC") Section 480-15-302 (4). Specifically, WAC 480-15-302(4) requires an applicant for a household goods carrier permit to provide:

[E]vidence that the applicant possesses sufficient financial resources to operate a moving company. The commission will accept as evidence the completed financial statement form included in the household goods moving company permit application or the alternative documents listed on the financial statement form

Although Dolly, Inc. ("Dolly") does not move household goods, but rather connects individuals who need such items moved with other individuals who have to capacity to move such items, as proof that Dolly, "possesses sufficient financial resources" Dolly submits the following excerpts from its business plan in lieu of a submitting either a financial statement, balance sheet, or profit and loss statement as true and accurate reflections of Dolly's financial resources:

- 1) For FY 2015, the Washington State Department of Revenue ("DOR") reported that Dolly's gross revenue in Washington state was \$1.06M, 1
- 2) For FY 2016, the DOR reported Dolly's gross revenue to be \$4,186,559,99.<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> UTC Docket TV-171212, Order 02 (Corrected) at ¶ 35

<sup>&</sup>lt;sup>2</sup> Id.

# dolly

Dolly, Inc. | 901 5th AVE, Suite 600, Seattle, WA 98164 | 206.494.3198

- 3) Since FY 2016, Dolly has expanded into new and lucrative markets, expanded its team from 30 to 40 full-time employees, and experienced significant revenue growth on its way to a national presence,
- 4) Heading into FY 2018, Dolly intends to expand into at least five new markets and continue to build out its team in Seattle.

In light of the above statements, Dolly without question possesses "sufficient financial resources" required to approve its household goods carrier permit application.

If you have any questions, please contact the undersigned.

7/1/1/2

Armikka R. Bryant, WSBA # 35765 Director of Legal and Government Affairs

Dolly, Inc.

### SAFETY AND OPERATIONS

CONTROLLED SUBSTANCE AND ALCOHOL USE AND TESTING (<u>Title 49, Code of Federal Regulations Part 382 and Part 40</u>). If you operate commercial motor vehicles, your drivers must be in a Controlled Substance and Alcohol Use and Testing program. You must have an alcohol and controlled substances testing program. Please attach evidence of your enrollment in a drug and alcohol testing program.

### **SAFETY RESPONSIBILITIES**

List the person and position responsible for understanding and complying with the <u>Federal Motor Carrier Safety Regulations</u> (FMCSR) and Washington State Laws and commission rules (WAC) as described below. Please refer to the WAC rules, Fact Sheets and publication "Your Guide to Achieving a Satisfactory Safety Rating" for assistance with requirements that may apply to your specific operations

COMMERCIAL DRIVER'S LICENSE (CDL) STANDARDS REQUIREMENT AND PENALTIES (Title 49, Code of Federal Regulations Part 383). If you operate commercial motor vehicles, your drivers must have a valid CDL.

DRIVER QUALIFICATION REQUIREMENTS: (Title 49, Code of Federal Regulations Part 391). Each of your drivers must meet minimum qualification requirements. You must maintain driver qualification files for each driver.

DRIVERS HOURS OF SERVICE (Title 49, Code of Federal Regulations Part 395). Each of your drivers must maintain hours of service logs. You must maintain true and accurate hours of service records for each driver.

INSPECTION, REPAIR AND MAINTENANCE (Title 49, Code of Federal Regulations Part 396). You must systematically inspect, repair, and maintain all motor vehicles.

PARTS AND ACCESSORIES NECESSARY FOR SAFE OPERATION (Title 49, Code of Federal Regulations Part 393). You must maintain parts and accessories in a safe condition.

LIABILITY INSURANCE REQUIREMENTS (WAC 480-15-530). You must file and maintain proof of public liability and proper damage insurance (\$300,000 minimum coverage for vehicles under 10,000 pounds GVWR and \$750,000 minimum coverage for vehicles 10,000 pounds GVWR or more)

CARGO INSURANCE REQUIREMENTS (WAC 480-15-550). You must maintain cargo insurance coverage (\$10,000 for household goods transported in motor vehicles under 10,000 pounds GVWR and \$20,000 for vehicles 10,000 pounds GVWR or more).

Name:	Position:	
Armikka R. Bryant		Director of Legal and Government Affairs

OPERATIONAL RESPONSIBILITIES					
Annual Reports and Regulatory Fees (WAC 480	-15-480). You must annually file a report of your				
financial operations and pay regulatory fees.					
Name:	Position:				
Armikka R. Bryant	Director of Legal and Government Affairs				
	egulations: Individuals and companies doing business in				
	ulations of local, state, and federal agencies. Please state				
	zation who will be responsible for ensuring compliance				
	out not limited to the Department of Labor and Industries				
	artment of Licensing (vehicle and drivers licenses, business				
	fuel permits, fuel tax; Secretary of State (corporate size or over-weight permits); Department of Revenue,				
Internal Revenue Service (taxes); and Employment					
Name:					
Armikka R. Bryant	Position Director of Legal and Government Affairs				
7 Hillikka R. Diyant	Director of Legal and Government Arians				
If you would like to receive information about	new household goods carriers, check here $\Box$				
DECLARATION OF THE PROPERTY OF	ON OF APPLICANT				
	in itself constitute authority to operate as a household				
goods mover.	in itself constitute authority to operate as a nousehold				
As the applicant for a household goods permit, I understand the responsibilities of a motor carrier and I am in compliance with all local, state and federal regulations governing businesses, including household goods movers, in the state of Washington.					
I understand that if the commission grants my application as a new entrant I will receive temporary authority to provide service as a household goods carrier on a provisional basis for at least six months. During this time, the commission will evaluate whether I have met the criteria in WAC 480-15-305 to obtain permanent authority. I also understand that I must comply with all conditions placed on my temporary permit and that failure to do so will result in cancellation of my permit.					
My employees are sufficiently trained to comply with commission rules regarding estimates, bills of lading, rates and charges and terms and conditions of household goods moves. In addition, my employees are sufficiently trained to comply with commission rules regarding vehicle operation, maintenance, and all other safety requirements. My company will provide a copy of the customer survey to each customer for whom we provide transportation service.					
I understand the commission will complete a criminal background check on each person named in the application.					
I certify or declare under penalty of perjury under the laws of the State of Washington that the information contained in this application is true and correct.					
Armikka R. Bryant  Print name of applicant  Sig	July, 6, 2018 Seattle, Washington				
Print name of applicant Sig	nature of Applicant Date and Location				



### **ATTACHMENT A**

### HOUSEHOLD GOODS STATEMENT OF SUPPORT

Your application must include at least three shipper or public statements supporting the proposed household goods moving service. Shipper statements may come from persons or organizations with a need for household goods moving services, or who support your request for a permit to provide those services. These forms may be copied by you as needed.

**Applicant Name: Austin Cohn** 

### The following must be completed by the Supporter of the applicant

Name, Title, and Business Name:

**Austin Cohn** 

Address (include street address, mailing address, city, state, zip, and county):

3417 31st Ave W Seattle, WA 98199. County of King.

Phone Number: (206) 579-1344

Do you currently need the services of a residential household goods moving company?

No √-Yes If yes, please describe your current moving needs:

Our family is trading out two large couches for three smaller ones. The buyers of each couch are different and we won't be able to coordinate a time that works for each person at the same time that works for us.

Do you anticipate a future need for the services of a residential household goods moving company?

No √-Yes

If yes, please describe your future moving needs

We are helping my in-laws move some items from their primary home to their beach cabin. My father in-law will need help in moving some of the heavier items from point to point.

Briefly describe how granting this company a permit to provide household goods moving services in Washington State will benefit you, your business, and/or your community:

Moving items is one of the least desirable activities for me. Being able to trust and rely on Dolly has taken the negative out of moving due to their professionalism, timeliness, comfort and ease of the transaction. I always recommend Dolly to friends which is a great community service.

Is there anything else the Commission should consider when making a determination about this company's application for a household goods permit?

Dolly is a company that has taken a frustrating task and made it simple. The Helpers work hard because they earn additional income after a job well done. I remember what moving items was like before Dolly and it wasn't pleasant. Dolly has alleviated this issue and I hope they continue to operate in and around

I certify (or declare) under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

6.28.18 -- Seattle

Date and Location

Signature of Person Completing Form



### **ATTACHMENT A**

### HOUSEHOLD GOODS STATEMENT OF SUPPORT

Your application must include at least three shipper or public statements supporting the proposed household goods moving service. Shipper statements may come from persons or organizations with a need for household goods moving services, or who support your request for a permit to provide those services. These forms may be copied by you as needed.

Applicant Name: Leigh Callagum	
Leigh Chuagha	
The following must be completed by the Supporter of the applicant	
Name, Title, and Business Name:	
Christopher Leigh Callaghan	
Address (include street address, mailing address, city, state, zip, and county):	
5148 NE 41 St. Seattle WA 98105	
Phone Number: 206 ~ 228 - 2981	
Do you currently need the services of a residential household goods moving company?	
□ No ☑ Yes If yes, please describe your current moving needs:	
Yes I am in need of help moving though between homes and and offer up.	
Do you anticipate a future need for the services of a residential household goods moving company?	
□ No □Yes If yes, please describe your future moving needs:	
For the same risson as stated above	
Briefly describe how granting this company a permit to provide household goods moving services in Washington	
State will benefit you, your business, and/or your community:	
Provides a new option that WA state residents need and should new access to. Also, given the moing costs of living in scattle and the surrounding area I'd bet that its avery neighbor way for Truell owners to make und must	
area I'd bet that it's a very neighbour way for Truell overest to make und must	
is there anything else the Commission should consider when making a determination about this company's	
application for a household goods permit?	0
Dolly's Service is wonderful and much needed. They are on a summer. No other moving service is . Please do not work against is	and I
athriving small business and this type of minoration out of tear of	
I certify (or declare) under penalty of perjury under the laws of the state of Washington that the foregoing is true	
and correct.	
C 42 C 6(2+2018)	
Signature of Person Completing Form Date and Location	
· · · · · · · · · · · · · · · · · · ·	



### **ATTACHMENT A**

### HOUSEHOLD GOODS STATEMENT OF SUPPORT

Your application must include at least three shipper or public statements supporting the proposed household goods moving service. Shipper statements may come from persons or organizations with a need for household goods moving services, or who support your request for a permit to provide those services. These forms may be copied by you as needed.

Applicant Name:
The following must be completed by the Supporter of the applicant
Name, Title, and Business Name: Gigi Buchanan - Owner - Phase Two Interiors
Address (include street address, mailing address, city, state, zip, and county):
3808 S. Edmunds Street Stattle WA 98118
Phone Number: 206-457-8419
Do you currently need the services of a residential household goods moving company?
No AlYes If yes, please describe your current moving needs: We are a furniture consignment shop. Our customers
We are a fumiliar with any
need furniture delivered to and from the shop!
Do you anticipate a future need for the services of a residential household goods moving company?
□ No 图Yes If yes, please describe your future moving needs: We will continue
to need moving services as long as we are
in business
Briefly describe how granting this company a permit to provide household goods moving services in Washington
State will benefit you, your business, and/or your community: Our cust oners use Dolly all the time. It helps our sales when we have Dolly to recommend and enables customers to receive merchanding
Dolly all the time. I had mables customers to receive,
Is there anything else the Commission should consider when making a determination about this company's
application for a household goods permit? Dolly is a wonderful company and fills a large voice of providing affordable and friendly and competent moving services!
and tompetent mouling services
I certify (or declare) under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.
Gigi Burhanan June 26, 2078  Signature of Person Completing Form  Date and Location
Signature of Person Completing Form Date and Location



### **CERTIFICATE OF LIABILITY INSURANCE**

DATE (MM/DD/YYYY) 12/20/2017

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to

PRODUCES   MAKE   Laura   Wainwright   FAX   Mainwright   FAX   Main		he terms and conditions of the policy ertificate holder in lieu of such endor				ndorse	ment. A sta	tement on th	is certificate does not con	ıfer rig	hts to the
DIBS Talescape Agency, Tac. 90 N Michigan Ave, 15th Floor Chicago II. 60611    Registration Ave, 15th Floor   Registration A				CONTACT							
ANALYSIS (Secretary Property of Secretary 1916)  COVERAGES  CERTIFICATE NUMBER: Cert ID 59192  THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE AFFORDED BY THE POLICIES OF SOUTHWARD THE RESPECT TO WHITE THE POLICIES OF INSURANCE AFFORDED BY THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINIONS ON ANY POLICIES AND THE AFFORDED BY THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINIONS ON ANY POLICIES AND THE AFFORDED BY THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINIONS ON ANY POLICIES AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINIONS ON ANY POLICIES AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINIONS ON ANY PROFILE AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONTINUOUS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED HERBIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND ANY PARK DEED THE POLICIES DESCRIBED POLICIES DESCRIBED POLICIES DESCRIBED POLICIES DESCRIBED POLICIES DESCRI				PHONE			EAV	12) 5	577-0725		
INSURERS A FORDING COVERAGE   NAC. F NEUREN A JOHN STATE STATE OF THE PROCESS OF THE POLICY PERSON NUMBER 1: MI TANUARDA COPTON A JOHN STATE OF THE ABOVE DESCRIBED POLICIES OF THE POLICY PERSON NUMBER: E STATE OF THE POLICY PERSON NU	90	o w Michigan Ave, 15th Floor				E-MAIL	-			12)	777-0723
BRUBER 1. James River Insurance Company   12203	Ch	icago IL 60611				ADDRE					NAIC #
INSURER   DOLLY   TOLLY   STATE   DOLLY   STATE   STATE   DOLLY   STATE   STATE   DOLLY   STATE   STATE   STATE   DOLLY   STATE   STATE   STATE   DOLLY   STATE   ST						INCLIDE		,			
NOURER C   Undertwriters at Lloyd's   NOURER C   NOURE C   NOURER C   NOURE	INSI	JRED				1					
901 St Avenue Skite 600 Seattle WA 99164  COVERAGES  CERTIFICATE NUMBER: cert 10 59192  REVISION NUMBER: THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWINTERADINA ANY RECUIREMENT. TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH HIS EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED by PADILIZATION.  A VIOLENT OF INSURANCE INDICATED IN THE POLICY PERIOD OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH HIS EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MY HAVE BEEN REDUCED by PADILIZATION.  A VIOLENT OF INSURANCE INDICATED IN THE POLICY PERIOD OF ANY OF THE POLICY PERIOD										-	33600
SAILE 600 SEARCHE WAY 99164  COVERAGES  CERTIFICATE NUMBER: Cort. 19 59192  REVISION NUMBER:  THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED MANED AND FOR THE POLICY PERIOD MIDICATED. NOTWITHSTANDING ANY REQUIREMENT, TEMPO ANY CONTRACT OR OTHER DOLICHENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OF MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS. SEXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS 36HOWN MAY PHAY BEEN REDUCED by PAPO CLAIMS.  A X COMMENCIAL CEMERAL LIBBILITY  INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS. SEXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS 36HOWN MAY PHAY BEEN REDUCED by PAPO CLAIMS.  A X COMMENCIAL CEMERAL LIBBILITY  INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS. SEXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS 36HOWN MAY PHAY BEEN REDUCED by PAPO CLAIMS.  A X COMMENCIAL CEMERAL LIBBILITY  CERTIFICATE LIMIT APPLIES PER:  A DEDUCY NUMBER:  A POLICY NUMBER:  A POLICY NUMBER:  A MORNOR AND	90	1 5th Avenue						riters at	riola s		
COVERAGES  CERTIFICATE NUMBER: cart ID 59192  REVISION NUMBER:  THIS S TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD  CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED COLMENT WITH RESPECT TO WHICH THIS  CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED COLMENT WITH RESPECT TO ALL THE TERMS,  EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAPID CLAMS.  A COMMERCIAL GENERAL LIABILITY  A COMMERCIAL GENERAL LIABILITY  A COMMERCIAL GENERAL LIABILITY  CERTIFICATE UNIT APPLIES PER  A POLICY DISCRIPTION OF OPERATIONS  A MY ANY DOLLOY DISCRIPTION OF OPERATION AND AND AND AND AND AND AND AND AND AN	Su	ite 600									
COVERAGES  CERTIFICATE NUMBER: Cert ID 59192  REVISION NUMBER: THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW NAVE BEEN ISSUED TO THE INSURED MAD ACOVER FOR THE POLICIES OF INSURANCE LISTED BELOW NAVE BEEN ISSUED TO THE INSURED MAD ACOVER THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY PE I SISUED OR MAY PERSON. THE POLICY PERIOD ON ANY CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY PE I SISUED OR MAY PERSON.  EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.  EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL CERTIFICATE MAD ANY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL CERTIFICATE MAD ANY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL CERTIFICATE MAD ANY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL CERTIFICATE MAD ANY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL CERTIFICATE MAD ANY COMMERCIAL CONTRACT OR OTHER MAD ANY WITH A COMMERCIAL CONTRACT OR OTHER COMMERCIAL CONTRA	Sea	attle WA 98164									
THIS IS TO CERTIEY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD NOICATED. NOTWITHSTANDING ANY REQUIREMENT. TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS. EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID LALMS.  REAR TYPE OF INSURANCE AND POLICY NUMBER OF THE POLICY PROBLEM TO ALL THE TERMS. EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID LALMS.  A X COMMERCIAL GENERAL LIMBURY POLICY NUMBER OF THE POLICY PROBLEM TO ALL THE TERMS. EXCLUSIONS OF THE POLICY PROBLEM TO ALL THE TERMS. PAID LAND TO ALL THE TERMS. P		VERAGES CEE	TIEI	CATE	NIIMBED: Cart ID 50		RF:		DEVISION NUMBED:		
INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.  A X COMMERCIAL GENERAL LIABILITY  A X COMMERCIAL GENERAL LIABILITY  CLAIMS MADE  A COMMERCIAL GENERAL LIABILITY  CLAIMS MADE  DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES / ACCUR  ANY AUTO  A LICINATE AND CONDITIONS OF SUCH POLICIES LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.  POLICY NUMBER  POLICY NUMBER  POLICY NUMBER  POLICY NUMBER  POLICY NUMBER  PRECEDITION OF OPERATIONS / LOCATIONS / VEHICLES / ACCUR  ANY AUTO  CA4360030204  12/17/2017  12/17/2017  12/17/2018  A UMBRELLA LIAB X OCCUR  A WORKERS COMMERCIAL SECURITY  NA PROPRIESE COMMERCIAL SECURITY  WORKERS							N ISSUED TO			POLIC	Y PERIOD
EXCLUSIONS AND CONDITIONS OF SUCH POLICIES, LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAMMS,  IT PYP OF INSURANCE  A X COMBERGIAL GENERAL LIABILITY  CLAMSHANDE X OCUR  CLAMSHANDE X OCUR  DESCRIPTION OF OPERATIONS / LOCATIONS / Locat	I۱	IDICATED. NOTWITHSTANDING ANY RI	EQUIF	REME	NT, TERM OR CONDITION	OF AN'	Y CONTRACT	OR OTHER	DOCUMENT WITH RESPECT	TO W	HICH THIS
NOR   TYPE OF INSURANCE   ADDLESUIR   POLICY NUMBER   POLICY										ALL TH	IE TERMS,
A X COMMERCIAL GENERAL LIABILITY    CLAIMS MADE   X OCCUR   CLAIMS MADE   X DEQUELED   CLAIMS MADE   X DEQUELED   CLAIMS MADE   X DEQUELED   X DEQUE	INSR		ADDL	SUBR		י אוםם					
CERTIFICATE HOLDER    CANCELLATION   CRITICATE HOLDER   CANCELLED BEFORE Informational Purposes Only   Cancelled by Cancel	LTR	TYPE OF INSURANCE	INSD	WVD	POLICY NUMBER		(MM/DD/YYYY)	(MM/DD/YYYY)		4	000 000
CAMISHAMOR   COUR   C	A				0065000				DAMAGE TO DENTED	1,	
GENI AGGREGATE LIMIT APPLIES PER:  SPENSONAL & ADV INLIPY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMPIOP AGG \$ 1,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 3,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 3,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 3,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 3,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 5,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 5,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE \$ 5,000,000 PRODUCTS - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE - COMPIOP AGG PRODUCTS - COMPIOP AGGREGATE - C					00650293		12/17/2017	12/17/2018	PREMISES (Ea occurrence) \$		
GENT AGGREGATE LIMIT APPLIES PER:  X POLLOY PEOT LOC  ATURN PROPRIES   LOC  OTHER   LOC  AUTOMOBILE LIABILITY  ALVOWED AUTOS   SCHEDULED A		X Deductible: \$2,500							MED EXP (Any one person) \$		
PRODUCTS - COMPIOP AGG   \$ 2,000,000									PERSONAL & ADV INJURY \$		
OTHER:  AUTOMOBILE LIABILITY  AUTOMOBILE LIABILITY  AUTOS ALTOS AUTOS AU									GENERAL AGGREGATE \$	2,	000,000
AUTOMBILE LIABILITY  ANY AUTO  ALCONNED ALTOS  X HIRED AUTOS  X EXCESS LIAB  CLAMS-MADE  DED  RETENTION S  B WORKERS COMPENSATION AND EMPLOYERS LIABILITY  WC5398356521017  I11inois  WC5398356521017  I11inois  WC5398356521017  I11inois  WC6398366521017  I11inois  WC7398366521017  I11inois  WC7398366710  WC73984010  WC73984010  WC73984010  WC		X POLICY JECT LOC								2,	000,000
A ANY AUTO ALLOWNED AUTOS AUTO	ļ		-						COMPINED CINICIE LIMIT		
ALLOWNED AUTOS SONO, OWNED AUTOS SON	_								(Ea accident)	1,	000,000
AUTOS AUTOS NON-OWNED AUTOS X AUTOS NON-OWNED AUTOS X AUTOS SOCIETA SO	A				CA4360030204		12/17/2017	12/17/2018			
A UMBRELLA LIAB X OCCUR X EXCESS LIAB CLAIMS-MADE DED RETENTION \$  WORKERS COMPENSATION AND EMPLOYERS (LABILITY NAME OF FICE ARM MERCE EXCLUDED? (Mandator) in NH) If yes, describe under DESCRIPTION OF OPERATIONS below  C CYBER LIABILITY  CR162356  CCR162356  CCR162356  CANCELLATION  CERTIFICATE HOLDER  CANCELLATION  Per accident) \$  \$  AUTOS  B AUTOS  \$  O00806340  12/17/2017 12/17/2018 EACH OCCURRENCE \$ 3,000,000 AGGREGATE \$ 3,000,000 AGGREGATE \$ 3,000,000 AGGREGATE \$ 5,000,000 AGGREGATE \$ 5,000,000 AGGREGATE \$ 5,000,000 AGGREGATE AND EMPLOYERS (AGGREGATE AND EMPLOYEES SECONDO)  ELL DISEASE - PA EMPLOYEE \$ 5,000,000 AGGREGATE \$ 5	İ	AUTOS AUTOS							DDODEDT/ DAMAGE		
A UMBRELLA LIAB X OCCUR X EXCESS LIAB CLAIMS-MADE  DED RETENTIONS  B WORKERS COMPRISATIONS AND EMPLOYERS LIABBLITY ANY PROPRIET ORPHATHEMEXECUTIVE (N IN OFF OCERATIONS below)  C CYBER LIABILITY  CR162356  CR162356  CR162356  CR162356  CANCELLATION  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROPOSIONS.	İ	X HIRED AUTOS X AUTOS							(Per accident)		
RETENTIONS   S   S   A   A   A   A   A   A   A	<u> </u>										·····
DED RETENTIONS  WORKERS COMPENSATION ANY PROPRIETING PERATIONS AND EMPLOYER LIABILITY ANY PROPRIETION OF OPERATIONS below  C CYBER LIABILITY  CR162356  CR16	A	- OCCOR			000806340		12/17/2017	12/17/2018	EACH OCCURRENCE \$	3,	000,000
MORKERS COMBENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR PARTNER REXECUTIVE (Mandatory in Mi) By Sessible under Company (Mandatory in Mi) By Sessible		X EXCESS LIAB CLAIMS-MADE							AGGREGATE \$	3,	000,000
ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (IMAND ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (IMAND ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DAY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DAY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THE POLICY WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
ANY PROPRIETOR/PARTNER/EXECUTIVE NOTICE RECLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below  C CYBER LIABILITY  CR162356  12/17/2017  12/17/2018  AGGREGATE \$ 5,000,000  E.L. DISEASE - POLICY LIMIT \$ 500,000  E.L. DISEASE	В	AND EMBLOVEDS! LIABILITY			WC539S356521017		12/06/2017	12/06/2018	X STATUTE ER		
CERTIFICATE HOLDER  CERTIFICATE HOLDER  CANCELLATION  CELL DISEASE - EA EMPLOYEE \$ 500,000   E.L. DISEASE - EA EMPLOYEE \$ 500,000   E.L. DISEASE - EA EMPLOYEE \$ 500,000   E.L. DISEASE - POLICY LIMIT \$ 500,000   S  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.		ANY PROPRIETOR/PARTNER/EXECUTIVE	N/A		Illinois				E.L. EACH ACCIDENT \$		500,000
C CYBER LIABILITY  CR162356  12/17/2017  12/17/2018 AGGREGATE \$ 5,000,000 \$  DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  For Informational Purposes Only  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.		(Mandatory in NH)							E.L. DISEASE - EA EMPLOYEE \$		500,000
DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  For Informational Purposes Only  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.		DESCRIPTION OF OPERATIONS below							E.L. DISEASE - POLICY LIMIT \$		500,000
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)  For Informational Purposes Only  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.	С	CYBER LIABILITY			CR162356		12/17/2017	12/17/2018	AGGREGATE	5	000 000
CERTIFICATE HOLDER  CANCELLATION  CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.									\$	٠,	1
CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.									\$		
CERTIFICATE HOLDER  CANCELLATION  SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.			LES (A	CORD	101, Additional Remarks Schedu	le, may b	e attached if mor	re space is requir	red)		
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.	. 0.	informational rurposes only									
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											I
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.	CEI	RTIFICATE HOLDER				CANC	ELLATION				
THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.											
ACCORDANCE WITH THE POLICY PROVISIONS.											
Evidence of Coverage		January 16 Garrer								DELIV	LEUED IN
	EV.	uence or coverage			Į						

© 1988-2014 ACORD CORPORATION. All rights reserved.

### **ATTACHMENT E**

July 3, 2018

### **VIA WEB PORTAL**

Mr. Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, Washington 98504-7250

RE: United States Department of Transportation Number Operating and Washington State Household Goods Moving Permit Application

Dear Mr. King:

1

2

Dolly, Inc. ("Dolly") files this Attachment E in conjunction with its *HOUSEHOLD GOODS*MOVING COMPANY PERMIT APPLICATION to explain why it does not possess a United States

Department of Transportation Number ("USDOT No.").

Dolly is an Internet and app-based software company that provides a technology platform that allows consumers to post jobs with details about what they need help with (e.g. time, location and items for transport). Dolly does not own any vehicles or employ any individuals to perform any moving services. As a result, Dolly does is unable to obtain a USDOT No.

Dolly, Inc.

901 Fifth Avenue, Suite 600 Seattle, Washington 98164-2086

Office: 206-494-3198 Fax: 833-817-6581

E-mail: armikka@dolly.com

Sincerely,

Armikka R. Bryant

Director of Legal and Government Affairs

4

5

6

7 8

9

10 11

12

13 14

15 16

17

18

19

20 21

22

23 24

25

26 27

28

### BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

DOCKET NO TV-171212

Determining the Proper Carrier Classification of, and Complaint for Penalties Against:

PETITION FOR RULE EXEMPTION

DOLLY, INC.

### T. INTRODUCTION

COMES NOW Dolly, Inc. ("Dolly") by and through its attorney, Armikka R. Bryant, and in accordance with WAC 480-07-110 and 480-07-370 files this Petition for Rule Exemption ("Petition") respectfully requesting the Commission's approval to obtain Household Goods Moving Company and Common Carrier of Property permits, pursuant to Order 04 in this docket. This Petition requests permission to operate as a household goods carrier and common carrier in the state that comports with Dolly's business model, explained below.

Contemporaneous with this Petition, Dolly is today filing applications for Household Goods Moving Company and Common Carrier of Property permits which also include Attachments explaining why Dolly does not qualify for USDOT numbers, which relates to this Petition as well.

For its applications, Dolly respectfully requests an exemption under WAC 480-07-110 to the extent Chapters 480-14 and 480-15 WAC requires the company to comply with regulations intended to apply to traditional moving and common carrier businesses that own and operate commercial vehicles and employ individuals to perform moving or common carrier services.

Dolly therefore requests exemptions from the following Commission rules: PETITION FOR RULE EXEMPTION - 1

and common carrier brokers	1	11 -	14 Motor carriers, excluding household goods carriers
WAC 480-14-20:	2	I (	
WAC 480-14-190: Permits	2		
WAC 480-14-140: Fees   WAC 480-14-150: WAC 480-14-180: Applications for intrastate authority   WAC 480-14-190: Common carrier permits   WAC 480-14-210: Change of carrier name and business structure   WAC 480-14-290: Interstate authority   WAC 480-14-290: Interstate authority   WAC 480-14-300: Interstate carrier fees	3	<b> </b>	
5         WAC 480-14-150:         Periodic reports and regulatory fees           6         WAC 480-14-180:         Applications for intrastate authority           6         WAC 480-14-190:         Common carrier permits           7         WAC 480-14-210:         Insurance requirements           8         WAC 480-14-290:         Interstate authority           9         WAC 480-14-300:         Interstate authority           10         WAC 480-15-010:         Purpose and application           11         WAC 480-15-020:         Definitions           12         WAC 480-15-450:         Excmptions from rules           13         WAC 480-15-450:         Excmptions from rules           14         WAC 480-15-186:         Application required for new authority to operate as a household goods carrier           14         WAC 480-15-190:         Service territory           15         WAC 480-15-230:         Application fees           16         WAC 480-15-300:         Provisional authority           17         WAC 480-15-300:         Permanent authority           18         WAC 480-15-480:         Involuntary suspension of a permit           19         WAC 480-15-490:         Involuntary cancellation of a permit           10         WAC 480-15-490:	4	I 1	
WAC 480-14-180: Applications for intrastate authority   WAC 480-14-190: Common carrier permits   WAC 480-14-210: Change of carrier name and business structure   WAC 480-14-290: Interstate authority   WAC 480-14-290: Interstate authority   WAC 480-14-300: Interstate carrier fees			
6         WAC 480-14-190: Change of carrier name and business structure           7         WAC 480-14-250: Insurance requirements           8         WAC 480-14-290: Interstate authority           9         UAC 480-14-290: Interstate carrier fees           10         WAC 480-15-010: Purpose and application           11         WAC 480-15-010: Purpose and application           12         WAC 480-15-035: Exemptions from rules           12         WAC 480-15-450: Enforcement           13         WAC 480-15-180: Carrier operations that require a household goods permit           14         WAC 480-15-180: Application required for new authority to operate as a household goods carrier           15         WAC 480-15-190: Service territory           16         WAC 480-15-305: Provisional authority           17         WAC 480-15-300: Provisional authority           18         WAC 480-15-450: Involuntary suspension of a permit           19         WAC 480-15-450: Involuntary cancellation of a permit           10         WAC 480-15-450: Involuntary cancellation of a permit           11         WAC 480-15-450: Involuntary cancellation of a permit           12         WAC 480-15-500: Tariff maintenance and fees           13         WAC 480-15-500: Tariff maintenance and fees           14         WAC 480-15-500: Tariff maintenance and fees	5		
WAC 480-14-210:	6		
WAC 480-14-250: Insurance requirements   WAC 480-14-290: Interstate authority   WAC 480-14-300: Interstate carrier fees	U	I <b>I</b>	Change of carrier name and business structure
WAC 480-14-290: Interstate authority   WAC 480-14-300: Interstate carrier fees	7	•	
Chapter WAC 480-15 Household goods carriers  WAC 480-15-010: Purpose and application WAC 480-15-020: Definitions WAC 480-15-035: Exemptions from rules WAC 480-15-450: Enforcement WAC 480-15-186: Carrier operations that require a household goods permit WAC 480-15-186: Application required for new authority to operate as a household goods carrier WAC 480-15-190: Service territory WAC 480-15-302: Application fees WAC 480-15-302: Provisional authority WAC 480-15-303: Permanent authority WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-430: Involuntary cancellation of a permit WAC 480-15-480: Manual reports and regulatory fees WAC 480-15-500: Tariff and rates, general WAC 480-15-500: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Changing commission-published tariffs WAC 480-15-550: Criminal background checks for prospective employees WAC 480-15-550: Cargo insurance WAC 480-15-550: Equipment safety requirements WAC 480-15-500: Advertising WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-700: Weight			*
Chapter WAC 480-15 Household goods carriers  WAC 480-15-010: Purpose and application WAC 480-15-020: Definitions WAC 480-15-035: Exemptions from rules  WAC 480-15-450: Enforcement WAC 480-15-180: Carrier operations that require a household goods permit WAC 480-15-186: Application required for new authority to operate as a household goods carrier WAC 480-15-190: Service territory WAC 480-15-230: Application fees WAC 480-15-302: Provisional authority WAC 480-15-305: Permanent authority WAC 480-15-305: Permanent authority WAC 480-15-490: Involuntary suspension of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Cargo insurance WAC 480-15-550: Cargo insurance WAC 480-15-590: Leasing vehicles WAC 480-15-600: Equipment safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-600: Equipment safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-600: Supplemental estimates WAC 480-15-700: Weight	8		•
Chapter WAC 480-15 Household goods carriers	9		
WAC 480-15-010: Purpose and application   WAC 480-15-020: Definitions   WAC 480-15-035: Exemptions from rules   WAC 480-15-450: Enforcement   WAC 480-15-180: Carrier operations that require a household goods permit   WAC 480-15-186: Application required for new authority to operate as a household goods carrier   WAC 480-15-190: Service territory   WAC 480-15-230: Application fees   WAC 480-15-302: Provisional authority   WAC 480-15-305: Permanent authority   WAC 480-15-305: Permanent authority   WAC 480-15-430: Involuntary suspension of a permit   WAC 480-15-480: Annual reports and regulatory fees   WAC 480-15-480: Annual reports and regulatory fees   WAC 480-15-500: Tariff and rates, general   WAC 480-15-500: Tariff and rates, general   WAC 480-15-510: Changing commission-published tariffs   WAC 480-15-520: Individual carrier tariffs   WAC 480-15-530: Public liability and property damage insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-500: Equipment safety requirements   WAC 480-15-500: Equipment safety requirements   WAC 480-15-500: Leasing vehicles   WAC 480-15-600: Supplemental estimates   WAC 480-15-600: Supplemental estimates   WAC 480-15-710: Bill of lading   WAC 480-15-750: Weight   WAC 480-15-750: WAC 480-15-750: Weight   WAC 480-15-750: Weight   WAC 480-15-750:		Chapter WAC 480-	15 Household goods carriers
WAC 480-15-020: Definitions   WAC 480-15-035: Exemptions from rules   WAC 480-15-450: Enforcement   WAC 480-15-180: Carrier operations that require a household goods permit   WAC 480-15-186: Application required for new authority to operate as a household goods carrier   WAC 480-15-190: Service territory   WAC 480-15-230: Application fees   WAC 480-15-302: Provisional authority   WAC 480-15-305: Permanent authority   WAC 480-15-305: Permanent authority   WAC 480-15-430: Involuntary suspension of a permit   WAC 480-15-430: Involuntary cancellation of a permit   WAC 480-15-480: Annual reports and regulatory fees   WAC 480-15-480: Annual reports and regulatory fees   WAC 480-15-500: Tariff maintenance and fees   WAC 480-15-500: Tariff maintenance and fees   WAC 480-15-520: Individual carrier tariffs   WAC 480-15-520: Cargo insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-550: Equipment safety requirements   WAC 480-15-500: Equipment safety requirements   WAC 480-15-500: Leasing vehicles   WAC 480-15-60: MAC 480-15-60: Information household goods carriers must provide to customers   WAC 480-15-60: Supplemental estimates   WAC 480-15-700: Weight   WAC 480-15-700:	10		
WAC 480-15-035: Enforcement WAC 480-15-450: Enforcement WAC 480-15-186: Carrier operations that require a household goods permit WAC 480-15-186: Application required for new authority to operate as a household goods carrier WAC 480-15-190: Service territory WAC 480-15-230: Application fees WAC 480-15-302: Provisional authority WAC 480-15-305: Permanent authority WAC 480-15-306: Involuntary suspension of a permit WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general Tariff and rates, general WAC 480-15-50: Changing commission-published tariffs WAC 480-15-50: Changing commission-published tariffs WAC 480-15-550: Cargo insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Equipment safety requirements WAC 480-15-50: Driver safety requirements WAC 480-15-50: Driver safety requirements WAC 480-15-60: Equipment safety requirements WAC 480-15-60: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-60: Supplemental estimates WAC 480-15-70: Bill of lading WAC 480-15-70: Weight	1.1	WAC 480-15-020:	
WAC 480-15-180: Carrier operations that require a household goods permit WAC 480-15-186: Application required for new authority to operate as a household goods carrier WAC 480-15-190: Service territory WAC 480-15-300: Application fees WAC 480-15-302: Provisional authority WAC 480-15-305: Permanent authority WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-550: Cargo insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-600: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-630: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	11	WAC 480-15-035:	Exemptions from rules
WAC 480-15-180: Carrier operations that require a household goods permit WAC 480-15-186: Application required for new authority to operate as a household goods carrier WAC 480-15-190: Service territory WAC 480-15-230: Application fees WAC 480-15-305: Permanent authority WAC 480-15-305: Permanent authority WAC 480-15-450: Involuntary suspension of a permit WAC 480-15-450: Involuntary cancellation of a permit WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Tariff maintenance and fees WAC 480-15-500: Changing commission-published tariffs WAC 480-15-550: Cargo insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Cargo insurance WAC 480-15-560: Equipment safety requirements WAC 480-15-560: Equipment safety requirements WAC 480-15-600: Advertising WAC 480-15-600: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-630: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	12	WAC 480-15-450:	Enforcement
household goods carrier		WAC 480-15-180:	Carrier operations that require a household goods permit
14         WAC 480-15-190:         Service territory           15         WAC 480-15-230:         Application fees           WAC 480-15-302:         Provisional authority           16         WAC 480-15-305:         Permanent authority           17         WAC 480-15-430:         Involuntary suspension of a permit           18         WAC 480-15-480:         Involuntary cancellation of a permit           19         WAC 480-15-490:         Tariff and rates, general           19         WAC 480-15-500:         Tariff maintenance and fees           WAC 480-15-500:         Tariff maintenance and fees           WAC 480-15-520:         Individual carrier tariffs           20         WAC 480-15-530:         Public liability and property damage insurance           21         WAC 480-15-550:         Cargo insurance           22         WAC 480-15-550:         Criminal background checks for prospective employees           23         WAC 480-15-500:         Equipment safety requirements           24         WAC 480-15-500:         Leasing vehicles           25         WAC 480-15-600:         Advertising           26         WAC 480-15-600:         Information household goods carriers must provide to           26         WAC 480-15-600:         Supplemental estimates	13	WAC 480-15-186:	Application required for new authority to operate as a
WAC 480-15-190: Service territory   WAC 480-15-230: Application fees   WAC 480-15-305: Provisional authority   WAC 480-15-305: Permanent authority   WAC 480-15-430: Involuntary suspension of a permit   WAC 480-15-450: Involuntary cancellation of a permit   WAC 480-15-480: Annual reports and regulatory fees   WAC 480-15-490: Tariff and rates, general   WAC 480-15-500: Tariff maintenance and fees   WAC 480-15-510: Changing commission-published tariffs   WAC 480-15-520: Individual carrier tariffs   WAC 480-15-530: Public liability and property damage insurance   WAC 480-15-550: Cargo insurance   WAC 480-15-550: Criminal background checks for prospective employees   WAC 480-15-560: Equipment safety requirements   WAC 480-15-60: Leasing vehicles   WAC 480-15-60: Advertising   WAC 480-15-60: Information household goods carriers must provide to customers   WAC 480-15-60: Supplemental estimates   WAC 480-15-710: Bill of lading   WAC 480-15-750: Weight   WAC 480-1	1.4	I I	rier
WAC 480-15-302: Provisional authority WAC 480-15-305: Permanent authority WAC 480-15-305: Involuntary suspension of a permit WAC 480-15-450: Involuntary cancellation of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Equipment safety requirements WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-60: Leasing vehicles WAC 480-15-60: Information household goods carriers must provide to customers WAC 480-15-60: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	14		
WAC 480-15-305: Permanent authority WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-450: Involuntary cancellation of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-630: Estimates WAC 480-15-60: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	15	i <b>i</b>	
WAC 480-15-430: Involuntary suspension of a permit WAC 480-15-450: Involuntary cancellation of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-500: Tariff and rates, general WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Equipment safety requirements WAC 480-15-50: Driver safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight		l <b>l</b>	
WAC 480-15-450: Involuntary cancellation of a permit WAC 480-15-480: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	16	1	
WAC 480-15-490: Involuntary cancellation of a permit WAC 480-15-490: Annual reports and regulatory fees WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-550: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-630: Estimates WAC 480-15-630: Estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	17		
WAC 480-15-490: Tariff and rates, general WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	1 /		
WAC 480-15-500: Tariff maintenance and fees WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-630: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	18		
WAC 480-15-510: Changing commission-published tariffs WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	1.0	1	
WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	19		
WAC 480-15-520: Individual carrier tariffs WAC 480-15-530: Public liability and property damage insurance WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	20		
WAC 480-15-550: Cargo insurance WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight		<b> </b>	
WAC 480-15-555: Criminal background checks for prospective employees WAC 480-15-560: Equipment safety requirements WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	21		
23       WAC 480-15-560:       Equipment safety requirements         24       WAC 480-15-590:       Leasing vehicles         25       WAC 480-15-610:       Advertising         25       WAC 480-15-620:       Information household goods carriers must provide to customers         26       WAC 480-15-630:       Estimates         27       WAC 480-15-660:       Supplemental estimates         28       WAC 480-15-750:       Weight	22	1	
WAC 480-15-570: Driver safety requirements WAC 480-15-590: Leasing vehicles WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	22	l I	
24       WAC 480-15-590: Leasing vehicles         WAC 480-15-610: Advertising         25       WAC 480-15-620: Information household goods carriers must provide to customers         26       WAC 480-15-630: Estimates         27       WAC 480-15-660: Supplemental estimates         WAC 480-15-710: Bill of lading         28       WAC 480-15-750: Weight	23	1	* * *
WAC 480-15-610: Advertising WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight			* *
WAC 480-15-620: Information household goods carriers must provide to customers WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	24		•
26	25	i e	
WAC 480-15-630: Estimates WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	23		information household goods carriers must provide to
WAC 480-15-660: Supplemental estimates WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	26	l .	Estimates
WAC 480-15-710: Bill of lading WAC 480-15-750: Weight	2.7		
28 WAC 480-15-750: Weight	27	l .	
,	28		e e e e e e e e e e e e e e e e e e e
			0

25

26

27

28

WAC 480-15-800: Customer complaints and claims Resolving customer complaints and claims WAC 480-15-810: Complaint and claim records retention WAC 480-15-830: Commission-referred complaints WAC 480-15-890: Requirements for interstate operations WAC 480-15-900:

Approving this Petition would be consistent with the public interest, the purposes underlying the household goods and common carrier regulations, and Chapters 81.24, 81.28, and 81.80 RCW.

### II. **GROUNDS FOR RELIEF**

Over 80 years ago the Washington State Legislature passed Chapter 81.24, 81.28, and 81.80 RCW for the purpose of regulating the business of operating a motor carrier of freight for compensation along the highways of this state. Since that time, the Commission has adopted regulations administering those laws. Those regulations, like the statutes they enforce, are intended to apply to traditional motor carriers because "moving service remains the same as it has been for centuries – using vehicles to move items from one household to another." Order 04 at ¶ 27. In short, the laws and regulations governing traditional motor carriers were adopted to apply to a business model that has been around for "centuries."

Fast- forward to 2018: Dolly is an Internet and app-based software company that provides a technology platform allowing consumers to post jobs with details about what they need help with (e.g. time, location and items for transport). Dolly owns no vehicles, employs no drivers, and is solely a mobile app-based company. Order 04 at ¶ 19. Dolly's platform is used to connect vetted customers with vetted pick-up truck owners. All jobs are completed at the truckowner's and customer's discretion and direction. Dolly is not involved in the transaction other than to facilitate its consummation, much like common carrier brokers who are principally excluded from Commission laws and regulations. The significant distinction however is that

PETITION FOR RULE EXEMPTION - 3

Dolly must follow the same rules and regulations as large, traditional, commercial movers, where common carrier brokers are permitted to operate principally without Commission oversight.

A significant portion of the household goods regulations contain rules regarding equipment and driver safety, yet Dolly does not employ any drivers or even own a vehicle. An exemption is necessary in this case because it is clear that there is no way for a business such as Dolly, working as a digital marketplace, to comply with existing motor carrier regulations that are intended to apply to a centuries old business model. Because the motor carrier rules and regulations have not been updated to keep pace with current technology Dolly must request exemption from laws.

### III. PETITION FOR EXEMPTION

WAC 480-07-110 provides that the Commission may grant an exemption from or modify the application of its rules in individual cases if consistent with the public interest and the purposes of the underlying regulation:

The commission uses the public interest standard to determine whether to grant an exemption from, or modification to, a commission rule. Factors the commission may consider in making this determination include whether the rule imposes an undue hardship on the requesting person of a degree or a kind different from hardships imposed on other similarly situated persons, and whether the effect of applying the rule to the requesting person would be contrary to the underlying purposes of the rule and the public interest.

The burdens imposed on Dolly by the regulations listed above are different in degree and kind than those imposed on traditional moving and common carrier companies. An exemption would be in the public interest because it would not work a hardship on household goods carriers and common carriers. An exemption is also appropriate because it allows Dolly to remain operating in compliance with Order 04 while Commission Staff and other interested stakeholders PETITION FOR RULE EXEMPTION - 4

13 14 15

12

16 17

18

19 20

22

21

23

26

25

27 28

PETITION FOR RULE EXEMPTION - 5

develop legislative recommendations for a regulatory framework that adequately regulates this industry.

The purpose of the provisions Dolly requests exemption from are intended to regulate activates it either does not engage in, property it does not own, and individuals it does not employ. For example, WAC 480-15-550 requires carriers to obtain cargo insurance protecting items they transport. However, even though the customer's items are covered under Dolly's liability insurance policy, because Dolly does not transport the customer's items, Dolly should not be required to obtain cargo insurance, a fact that any insurer would surely base its denial of coverage on. Another example of the inapplicability of the motor carrier regulations to Dolly's business model is WAC 480-15-555 which requires background checks for all employees. Dolly only employs software programmers, marketing professionals, and other office workers. WAC 480-15-555 is intended to cover motor carrier employees, specifically drivers. Dolly's "Helpers" are all independent contractors. Accordingly, Dolly should not be required to conduct criminal background checks for these its employees who WAC 480-07-555 never intended to cover. There are countless examples such as the these that illustrate how the motor carrier regulations should not be applicable to what is essentially a software and marketing company.

### IV. **CONCLUSION**

For the reasons stated above, Dolly respectfully requests that the Commission grant exemptions from the regulations listed above so Dolly may obtain Household Goods Carrier and Common Carrier permits. Additionally, although Dolly is requesting to be exempt from current Commission regulations, that does not mean Dolly seeks to be completely exempt from Commission regulation. Dolly seeks to engage the Commission in to comply with Commission regulations and Order 04 in this docket. Dolly respectfully requests the Commission grant this

Petition so both the Dolly and the Commission can continue to explore a path towards adopting regulations that regulate this industry fairly and adequately.

Dated this 6th day of July, 2018.

Armikka R. Bryant, WSBA # 35765 Director of Legal and Government Affairs Dolly, Inc.

901 Fifth Avenue, Suite 600 Seattle, Washington 98164-2086

Office: 206-413-5312 Mobile: 646-303-3533 Fax: 833-817-6581

Email: armikka@gmail.com

# BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOLLY, INC.,

Complainant,

v.

Docket No. TV-171212

CERTIFICATE OF SERVICE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Respondent.

TO: All Parties and Their Counsel of Record

I hereby certify and declare under penalty of perjury under the laws of the State of Washington that on July 6th, 2018 I served a copy of: Application for a Household Goods Permit, including attachments; Application for Common Carrier Permit; Petition for Exemption of Commission Rules, on all interested parties, or their counsel of record via the following method(s):

### ATTORNEY FOR RESPONDENT U.S. Mail, First Class () Jeff Roberson Legal Messenger () WSBA #45550 Overnight Mail () Washington State Utilities and Transportation Email (X) Commission 1400 S. Evergreen Park Dr. SW Olympia, WA 98504-7250 Phone: 360-753-6200 Email: jeff.roberson@utc.wa.gov

Perkins Coie LLP The PSE Building 10885 N.E. Fourth Street, Suite 700 Bellevue, WA 98004-5579 Phone: 425.635.1400

Fax: 425.635.2400

DATED this 6th day of July, 2018

PERKINS COIE LLP

Amanda Weis

Legal Practice Assistant to

Donna Barnett

## **PERKINSCOIE**

The PSE Building Bellevue, WA 98004-5579

+1.425.635.1400 PerkinsCoie.com

Donna L. Barnett

DBarnett@perkinscoie.com

D. +1.425 635.1419 Records Management F. +1.425.635.241906/18 CO

July 6, 2018

### VIA WEB PORTAL AND ELECTRONIC MAIL

Mr. Mark Johnson Executive Director and Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, Washington 98504-0128

Docket No. TV-171212 Re:

Dear Mr. Johnson:

Enclosed please find the following documents, which have been submitted for filing via the Commission's web portal on behalf of Dolly, Inc.:

- 1. Application for a Household Goods Permit, including attachments (171212 Dolly Appl HHG (7-6-18)(C),
- 2. Application for Common Carrier Permit (171212 Dolly Appl CC (7-6-18),
- 3. Petition for Exemption of Commission Rules (171212 Dolly Pet-Exmpt (7-6-18)), and
- 4. Certificate of service (171212 Dolly COS (7-6-18).

Dolly is submitting the enclosed documents for filing pursuant to the final order in this proceeding. However, please note that Initial Order 02, Initial Order 02 (Corrected), and the final order, Order 04, are currently under judicial review pursuant to RCW 34.05.570. In submitting the attached documents for filing, Dolly expressly reserves, and does not waive, any and all rights related to such judicial review.

The enclosed material includes information designated as confidential pursuant to WAC 480-07-160. Pursuant to WAC 480-07-160(4)(a), the basis on which the information is confidential is

July 6, 2018 Page 2

that it contains valuable commercial information, including trade secrets or confidential marketing, cost, or financial information.

Very truly yours,

Donna L. Barnett

DLB:alw