



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 Household Goods Authority Requested – check one **Fee Required**

- Provisional and permanent authority. The fee for provisional, and then permanent authority is a one-time fee. Complete pages 3-8 and Attachment A. \$ 550
- 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 \$ 550
- Permanent authority to transfer under the exceptions in [WAC 480-15-187](#). Complete pages 3-8 and Attachments B & C. \$ 250
- 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. \$ 250
- Name Change – Complete pages 3-5 and Attachment D. \$ 35

BUSINESS INFORMATION

Legal Name: _____ Dolly Apple, Inc _____

Trade Name, if applicable _____ Dolly _____

Physical Address _____ 901 5th Avenue, Suite 600, Seattle WA, 98164 _____

Mailing Address _____ SAME _____

Telephone Number () _____ 206-494-3198 _____ Fax Number () _____ 833-817-6581 _____

Email: _____ armikka@dolly.com _____

BUSINESS INFORMATION - continued

Is your business registered with the [Department of Revenue](#)? No Yes

UBI #: 603 437 688 USDOT #: N/A See Attachment E

If you currently do not have a USDOT number, go online at www.fmcsca.dot.gov/online-registration to apply or call 360-596-3812 for assistance.

Department of [Labor & Industries](#) (L&I) Worker's Comp account # 336,381-00

[Employment Security Department](#) (ESD) registration # 000052720000

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 [WAC 480-15-555](#), 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 [WAC 480-15-302](#) and [305](#).

TYPE OF BUSINESS STRUCTURE

Individual Partnership Corporation Other (LP, LLP, LLC) State of Incorporation DE

List the name, title and percentage of partner's share or stock distribution for major stockholders:

<u>Name</u>	<u>Title</u>	<u>Stock Distribution or % of Shares</u>
Dolly, Inc	Parent	100%

Must provide a copy of a valid driver's license or government-issued photo identification card for each person named in the application.

1. Describe the services you wish to provide. Explain how your services will enhance customer choice, promote competition, or fill an unmet need for service: _____

Dolly is an app-based marketplace which connects consumers and businesses that have local goods transportation needs with local truck owners (called "Helpers") who want to do the transportation for them. Dolly enables people to get help with on-demand, micro-move tasks that existing household goods carriers don't service thereby expanding the range of services available to WA state residents. In addition, there's only one other similar service operating in WA state (Lugg.com) so Dolly would be increasing competition for such services.

2. Briefly describe your experience in the transportation/household goods moving industry:

Dolly has been providing this service in 6 other markets, some for as long as 3 years.

3. Do you currently hold, or have you ever held, a permit to operate as a motor carrier of property?
 No Yes If yes, please indicate your permit number _____

4. Have you ever applied for and been denied a permit to operate as a motor carrier of property in Washington?
 No Yes If yes, please explain _____

5. Do you currently operate interstate? No Yes If yes, please indicate your MC# _____

6. Do you operate interstate as an agent of another company? No Yes
 If yes, what is the name of the company? _____

7. Do you have, or have you ever had a business-related legal proceeding against you in Washington, or in any other state? No Yes If yes, please list below:

Type of Legal Proceeding	Date	State
UTC Staff Investigation	January 2018	WA

*attach additional pages if necessary

8. Has any person named in this application ever been convicted of any crime involving theft, burglary, assault, sexual misconduct, identity theft, fraud, false statements, or the manufacture, sale, or distribution of a controlled substance? No Yes If yes, please list below:

Type of Conviction	Date	City/State

*attach additional pages if necessary

9. Has any person named in this application, been cited for violation of state laws or Commission rules? No Yes If yes, please list below:

Violation	Date	RCW/WAC
Operating 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 attached

FINANCIAL STATEMENT

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

Assets		Liabilities	
Cash in Bank	\$	Salaries/Wages Payable	\$
Notes Receivable	\$	Accounts Payable	\$
Investments	\$	Notes Payable	\$
Other Current Assets	\$	Mortgages Payable	\$
Prepaid Expenses	\$	TOTAL LIABILITIES	\$
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	\$

EQUIPMENT LIST

Describe 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
N/A				



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 \$4,186,559.99,²

¹ UTC Docket TV-171212, Order 02 (Corrected) at ¶ 35

² Id.



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.

Sincerely,


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

SAFETY AND OPERATIONS

CONTROLLED SUBSTANCE AND ALCOHOL USE AND TESTING ([Title 49, Code of Federal Regulations Part 382 and Part 40](#)). 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 [Federal Motor Carrier Safety Regulations \(FMCSR\)](#) 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:

Armikka R. Bryant

Position:

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

STATE OF WASHINGTON – general laws, rules and regulations: Individuals and companies doing business in the State of Washington must comply with the regulations of local, state, and federal agencies. Please state the name and position of the person in your organization who will be responsible for ensuring compliance with the laws of the State of Washington, such as, but not limited to the Department of Labor and Industries (industrial insurance, safety, prevailing wage); Department of Licensing (vehicle and drivers licenses, business licensing, Unified Business Identifier (UBI number), fuel permits, fuel tax; Secretary of State (corporate registrations); Department of Transportation (over-size or over-weight permits); Department of Revenue, Internal Revenue Service (taxes); and Employment Security.

Name: Armikka R. Bryant	Position: Director of Legal and Government Affairs
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If you would like to receive information about new household goods carriers, check here

DECLARATION OF APPLICANT

I understand that filing this application **does not** in itself constitute authority to operate as a household goods mover.

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



July, 6, 2018
Seattle, Washington

Print name of applicant

Signature of Applicant

Date and Location

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.

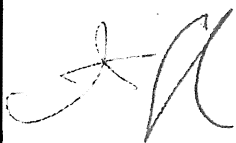
Briefly describe how granting this company a permit to provide household goods moving services in Washington State will benefit you, your business, and/or your community:

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.



Signature of Person Completing Form

6.28.18 -- Seattle

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:
 Leigh Callaghan

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 41st 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 things between homes and goods delivered that I buy on marketplaces like Craigslist 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 reason 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:
 No one else provides the type of service that Dolly does so it provides a new option that WA state residents need and should have access to. Also, given the rising costs of living in Seattle and the surrounding area, I'd bet that it's a very helpful way for truck owners to make ends meet.

Is there anything else the Commission should consider when making a determination about this company's application for a household goods permit?
 Dolly's service is wonderful and much needed. There are on demand. No other moving service is. Please do not work against a thriving small business and this type of innovation out of fear of change.

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

Signature of Person Completing Form: C. J. Callaghan
 Date and Location: 6/27/2010

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*

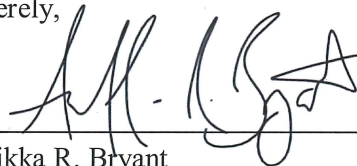
Dear Mr. King:

1 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.").

2 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

1
2 **BEFORE THE WASHINGTON STATE**
3 **UTILITIES AND TRANSPORTATION COMMISSION**
4

5 In the Matter of

DOCKET NO TV-171212

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

PETITION FOR RULE EXEMPTION

8 DOLLY, INC.
9

10 **I. INTRODUCTION**

11 COMES NOW Dolly, Inc. (“Dolly”) by and through its attorney, Armikka R. Bryant, and
12 in accordance with WAC 480-07-110 and 480-07-370 files this *Petition for Rule Exemption*
13 (“Petition”) respectfully requesting the Commission’s approval to obtain Household Goods
14 Moving Company and Common Carrier of Property permits, pursuant to Order 04 in this docket.
15 This Petition requests permission to operate as a household goods carrier and common carrier in
16 the state that comports with Dolly’s business model, explained below.
17

18 Contemporaneous with this Petition, Dolly is today filing applications for Household
19 Goods Moving Company and Common Carrier of Property permits which also include
20 Attachments explaining why Dolly does not qualify for USDOT numbers, which relates to this
21 Petition as well.
22

23 For its applications, Dolly respectfully requests an exemption under WAC 480-07-110 to
24 the extent Chapters 480-14 and 480-15 WAC requires the company to comply with regulations
25 intended to apply to traditional moving and common carrier businesses that own and operate
26 commercial vehicles and employ individuals to perform moving or common carrier services.
27

28 Dolly therefore requests exemptions from the following Commission rules:

PETITION FOR RULE EXEMPTION - 1

1 **Chapter WAC 480-14 Motor carriers, excluding household goods carriers**
2 **and common carrier brokers**

- 3 WAC 480-14-10: Purpose and application
4 WAC 480-14-20: Rules, general application of rules
5 WAC 480-14-90: Permits
6 WAC 480-14-140: Fees
7 WAC 480-14-150: Periodic reports and regulatory fees
8 WAC 480-14-180: Applications for intrastate authority
9 WAC 480-14-190: Common carrier permits
10 WAC 480-14-210: Change of carrier name and business structure
11 WAC 480-14-250: Insurance requirements
12 WAC 480-14-290: Interstate authority
13 WAC 480-14-300: Interstate carrier fees

14 **Chapter WAC 480-15 Household goods carriers**

- 15 WAC 480-15-010: Purpose and application
16 WAC 480-15-020: Definitions
17 WAC 480-15-035: Exemptions from rules
18 WAC 480-15-450: Enforcement
19 WAC 480-15-180: Carrier operations that require a household goods permit
20 WAC 480-15-186: Application required for new authority to operate as a
21 household goods carrier
22 WAC 480-15-190: Service territory
23 WAC 480-15-230: Application fees
24 WAC 480-15-302: Provisional authority
25 WAC 480-15-305: Permanent authority
26 WAC 480-15-430: Involuntary suspension of a permit
27 WAC 480-15-450: Involuntary cancellation of a permit
28 WAC 480-15-480: Annual reports and regulatory fees
29 WAC 480-15-490: Tariff and rates, general
30 WAC 480-15-500: Tariff maintenance and fees
31 WAC 480-15-510: Changing commission-published tariffs
32 WAC 480-15-520: Individual carrier tariffs
33 WAC 480-15-530: Public liability and property damage insurance
34 WAC 480-15-550: Cargo insurance
35 WAC 480-15-555: Criminal background checks for prospective employees
36 WAC 480-15-560: Equipment safety requirements
37 WAC 480-15-570: Driver safety requirements
38 WAC 480-15-590: Leasing vehicles
39 WAC 480-15-610: Advertising
40 WAC 480-15-620: Information household goods carriers must provide to
41 customers
42 WAC 480-15-630: Estimates
43 WAC 480-15-660: Supplemental estimates
44 WAC 480-15-710: Bill of lading
45 WAC 480-15-750: Weight

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

6 Approving this Petition would be consistent with the public interest, the purposes
7 underlying the household goods and common carrier regulations, and Chapters 81.24, 81.28, and
8 81.80 RCW.

9 II. GROUNDS FOR RELIEF

10 Over 80 years ago the Washington State Legislature passed Chapter 81.24, 81.28, and
11 81.80 RCW for the purpose of regulating the business of operating a motor carrier of freight for
12 compensation along the highways of this state. Since that time, the Commission has adopted
13 regulations administering those laws. Those regulations, like the statutes they enforce, are
14 intended to apply to traditional motor carriers because “moving service remains the same as it
15 has been for centuries – using vehicles to move items from one household to another.” Order 04
16 at ¶ 27. In short, the laws and regulations governing traditional motor carriers were adopted to
17 apply to a business model that has been around for “centuries.”

18
19 Fast- forward to 2018: Dolly is an Internet and app-based software company that
20 provides a technology platform allowing consumers to post jobs with details about what they
21 need help with (e.g. time, location and items for transport). Dolly owns no vehicles, employs no
22 drivers, and is solely a mobile app-based company. Order 04 at ¶ 19. Dolly’s platform is used to
23 connect vetted customers with vetted pick-up truck owners. All jobs are completed at the truck-
24 owner’s and customer’s discretion and direction. Dolly is not involved in the transaction other
25 than to facilitate its consummation, much like common carrier brokers who are principally
26 excluded from Commission laws and regulations. The significant distinction however is that
27

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

3 A significant portion of the household goods regulations contain rules regarding
4 equipment and driver safety, yet Dolly does not employ any drivers or even own a vehicle. An
5 exemption is necessary in this case because it is clear that there is no way for a business such as
6 Dolly, working as a digital marketplace, to comply with existing motor carrier regulations that
7 are intended to apply to a centuries old business model. Because the motor carrier rules and
8 regulations have not been updated to keep pace with current technology Dolly must request
9 exemption from laws.
10
11

12 **III. PETITION FOR EXEMPTION**

13 WAC 480-07-110 provides that the Commission may grant an exemption from or modify
14 the application of its rules in individual cases if consistent with the public interest and the
15 purposes of the underlying regulation:
16

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

26 The burdens imposed on Dolly by the regulations listed above are different in degree and
27 kind than those imposed on traditional moving and common carrier companies. An exemption
28 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

1 Petition so both the Dolly and the Commission can continue to explore a path towards adopting
2 regulations that regulate this industry fairly and adequately.
3

4
5 Dated this 6th day of July, 2018.

6 

7 _____
8 Armikka R. Bryant, WSBA # 35765
9 Director of Legal and Government Affairs
10 Dolly, Inc.
11 901 Fifth Avenue, Suite 600
12 Seattle, Washington 98164-2086
13 Office: 206-413-5312
14 Mobile: 646-303-3533
15 Fax: 833-817-6581
16 Email: armikka@gmail.com
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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

DOLLY, INC.,

Complainant,

v.

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Respondent.

Docket No. TV-171212

CERTIFICATE OF SERVICE

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

Jeff Roberson
WSBA #45550
Washington State Utilities and Transportation
Commission
1400 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250
Phone:360-753-6200

Email: jeff.roberson@utc.wa.gov

- U.S. Mail, First Class
- Legal Messenger
- Overnight Mail
- Email

DATED this 6th day of July, 2018

PERKINS COIE LLP



Amanda Weis
Legal Practice Assistant to
Donna Barnett

114017-0010/140516206.1

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

Donna L. Barnett
DBarnett@perkinscoie.com

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F. +1.425.635.2419

State Of WASH.
UTIL. AND TRANSP.
COMMISSION

07/06/18 08:17

Received
Records Management

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

Re: Docket No. TV-171212

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)).

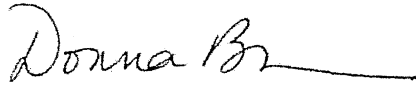
Dolly is submitting the enclosed documents for filing pursuant to the final order in this proceeding. However, please note that Initial Order 02, Initial Order 02 (Corrected), and the final order, Order 04, are currently under judicial review pursuant to RCW 34.05.570. In submitting the attached documents 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,

A handwritten signature in cursive script that reads "Donna Barnett". The signature is written in black ink and ends with a horizontal line.

Donna L. Barnett

DLB:alw