



**GREATAMERICAN
MOVING & STORAGE**

COVER LETTER

TO: Jeffrey D. Goltz, Philip B. Jones, Steven King, Sally Brown
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

FROM: Chana Green d/b/a
Great American Moving & Storage
DOT# 2029028
Owner
4300 S WAYSIDE DR #103
HOUSTON, TX 77087
(800) 557-7419

DATE: March 12th, 2014

PAGES: 4 (Including cover letter)

Docket Number: DOCKET TV-131603

REASON: Attached is a certified copy of the Reply to Response of Commission Staff in Opposition to Respondent's Motions. The document is filed on behalf of Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE in reference to **DOCKET TV-131603**.

PRIORITY: High

COMMENTS: I, Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE (DOT# 2029028), do hereby certify that a copy of the foregoing document has been sent by postage paid first class mail to the respondent on March 12th, 2014.

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Determining the Proper) DOCKET TV-131603
Carrier Classification of, and Complaint for)
Penalties Against:)
)
GREEN, CHANA d/b/a)
GREAT AMERICAN MOVING &)
STORAGE, **Movant**)
March 10th, 2014)
)
Respondent.)
.....

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UTIL. AND TRANSP.
COMMISSION

Reply to Response of Commission Staff in Opposition to Respondent's Motions

On March 6th, 2014, the Commission's Staff filed a response against Chana Green's motions. The Commission's Staff response opposes these motions because Chana Green's travel plans do not excuse tardiness and continuance of illegal business practices. Our motion to Reconsider is necessary for these reasons:

On December 31st, 2013, Movant, took a leave of absence for family reasons. Movant's family currently resides overseas. It was by no means a vacation.

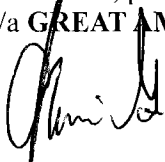
Movant attorney has been inaccessible in regards to settling any legal matters. As of February 10th, 2014 a legal technician is hired on a temporary basis to manage Movant's legal affairs. Filing errors were due to lack of legal support.

The Commission's Staff have yet to provide evidence of any illegal business practices, particularly since the final hearing on November 14th, 2014. The Movant assumed that the Commission's Staff will verify any changes that needed to be made according to the terms of the Initial Order, considering the Commission's Staff prompt responses. Great American Moving & Storage has changed the language to every website online, within Movant's control, to reflect that we still do not conduct intrastate moves. The Commission's Staff has yet to mention such facts.

In conclusion, for all of the above reasons, THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION should consider the argument as reason to extend deadline for reconsideration. **The Movant would prove past and present full compliance to RCW 81.80 other than the payment for \$1,500.00 violation due to lack of actual knowledge of the Final Order;** therefore, Movant's motion to reconsider and reinstatement of the suspension of \$3,500.00 should be granted. The Movant would agree to pay \$1,500 as stated prior to the FINAL ORDER aka Administrative Law Judge's order.

Respectfully submitted,

Chana Green, pro se
d/b/a **GREAT AMERICAN MOVING & STORAGE**



CERTIFICATE OF SERVICE

I, Chana Green d/b/a GREAT AMERICAN MOVING & STORAGE, do hereby certify that a copy of the foregoing documents has been sent by postage paid first class mail to the respondent at the address of:

Jeffrey D. Goltz
Commissioner
Tel: 360-664-1173
Fax: 360-586-1150
jgoltz@utc.wa.gov

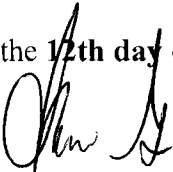
Philip B. Jones
Commissioner
Tel: 360-664-1169
Fax: 360-586-1150
pjones@utc.wa.gov

Steven King
Acting Executive Director
Tel: 360-664-1115
sking@utc.wa.gov

Sally Brown
Legal
Assistant Attorney General

Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

this the 12th day of March, 2014.



Chana Green, Owner
d/b/a **GREAT AMERICAN MOVING & STORAGE**

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