



TV-210737

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December 8, 2021

SENT VIA WEB PORTAL

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: *Inquiry to determine the appropriate process for clarifying whether Chapter 480-15 WAC allows household goods carriers to contract with third parties to provide services regulated by the Commission,*
Docket TV-210737, Comments of Public Counsel

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to the Washington Utilities and Transportation Commission's (the "Commission") November 16, 2021, Notice of Opportunity ("Notice") to Submit Written Comments in Docket TV-210737. The Commission opened Docket TV-210737 to determine the appropriate process for clarifying whether the existing household goods carrier rules allow household goods carriers to contract with third parties to provide services regulated by the Commission.

Public Counsel appreciates the opportunity to offer comments in this Docket. As stated in the Notice, the Commission opened this Docket after declining to enter a declaratory order in response to a petition from the Washington Movers Conference seeking a ruling on the role of third party contractors in the household goods moving industry (Docket TV-200348). In Docket TV-200348, Public Counsel responded to the petition for declaratory order and recommended that the Commission offer guidance and clarification through a policy docket or rulemaking. Our

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response to the petition in Docket TV-200348 is enclosed for the Commission's reference in this matter.¹

Public Counsel believes that the Commission should use this Docket to develop a regulatory framework that protects consumers and allows the household goods moving market to function and evolve. We have no specific responses to the questions included in the Notice, but ask Commission staff to review our enclosed previously filed response.

If you have any questions about this filing, please contact via e-mail Stephanie Chase at (206) 521-3212 or via e-mail at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

/s/ 

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NMS/SC/BCH

Enclosures

cc: Service List (via E-mail)

¹ Public Counsel's Response to Petition for Declaratory Order, *In re: Petition of the Wash. Movers Conf. for Declaratory Ord. Clarifying Whether Comm'n. Household Goods Rules Authorize Permitted Carrier to use Third-Party Contractors to Perform Regulated Serv.*, Docket TV-200348 (April 30, 2020) (enclosed with these comments as "Attachment A").