



Stress-Free Moving & Junk Removal

13624 Hwy 99, #B3, Lynnwood, WA 98087

April 30, 2024

Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

ATTN: Jeff Killip, Executive Director and Secretary

**RE: Thirlwall NW Holdings LLC
Penalty Assessment TV-240204
Application for Mitigation**

TV-240204

Received
Records Management
May 1, 2024

Dear Mr. Killip:

I am writing to you in support of my application for mitigation of the penalty assessment from violations found in the recent safety investigation I received from the Commission.

I admit the violations occurred however I believe the penalty should be reduced for the reasons stated below. I appreciate you considering this information relating to three violations listed in the Penalty Assessment document. Specifically:

WAC 480-15-530(1) – I did not realize that the insurance coverage limits I had purchased through Enterprise Truck Rentals were below the Combined Single Limit coverage of \$750,000 required by the UTC. I purchased the maximum coverage they offered which turned out to be below that requirement. After learning this, I am now using my own insurance coverages for any rented trucks; my policy offers Combined Single Limit coverage of \$1,000,000 which exceeds the requirements.

WAC 480-15-555(1) – I have always completed Criminal Background checks prior to the initial hiring of all employees without exception. I was not aware I had to re-run these checks upon rehiring employees if it was a short period of time since they left my employ. I will now run backgrounds checks for all rehires as well.

49 C.F.R. 391.15(a) – Joseph Delamare did not advise me that his driver's license became invalid and I'm not sure if he was aware either for some time. This was promptly corrected upon learning of the issue and his license reinstated by paying a small fee online.

I have not ignored any direction from the UTC's staff and my full intent has always been to comply with all regulations. I was not aware of the violations and while I recognize that's not an excuse, I feel it should be considered as mitigating to some extent.

I have been forthcoming and fully cooperative and responsive throughout the safety investigation with UTC personnel. I have also corrected violations as they were discovered and will be in compliance going forward. In their report the investigators noted that, and feel the likelihood of recurrence is low due to my actions. Also, I have no history of penalties for safety violations.

The monetary penalties assessed are derived from daily / per occurrence charges that continued without my knowledge of violations. Had I known, I would have addressed and corrected them much sooner which would have reduced the penalties.

Finally, as a result of the investigation I received an Overall Safety Fitness Rating of "SATISFACTORY".

For the reasons stated above I respectfully request that the Commission reduce the assessed penalties after considering this application for mitigation.

Thank you for your consideration.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jeff Thirlwall". The signature is fluid and cursive, with a large initial "J" and a stylized "T".

Jeff Thirlwall

COO / Owner
Thirlwall NW Holdings LLC
dba College Hunks Hauling Junk and Moving