



Via Electronic Mail Only

September 17, 2019

Daniel J. Teimouri,
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128, Olympia, WA
daniel.teimouri@utc.wa.gov

RE: *Dolly, Inc's Applications for Common Carrier and Household Goods Carrier Authority*
Docket TV-190594

Dear Mr. Teimouri,

I am writing in response to Staff's letters filed in Docket TV-190594 on September 9 and September 11. The Company has concerns regarding the condition that it only use Helpers who hold a common carrier or household goods carrier permit. Requiring the Company to use only Helpers who already possess permits effectively puts the Company out of business in the state.


The Company is very understanding of the concern that the Commission, "has no way of knowing who Dolly is arranging to physically perform household goods moves." And, the Company is prepared to continue working amicably with Staff to address that concern. For example, the Company proposes that it submit a (weekly/monthly/quarterly) report to the Commission detailing every transaction performed on the Company's platform.

The report can include any level of detail concerning the transportation of property the Commission requires (including the Helpers' background checks and insurance and driver's license information) to be assured the Company is protecting Washington consumers. The Company also proposes that it assume all responsibility for Helpers' compliance with applicable laws and regulations – as it currently does in Massachusetts, Pennsylvania, and Texas.

We do not believe it is Staff's intention to put the Company out of business. Nor do we believe the Company should be immune to the Commission's authority or receive special treatment. The Company remains dedicated to working with the Commission as it grapples with regulating the likes of Lugg, Amazon Flex, PickUp, GoShare, and others. That is why the Company is volunteering to submit standardized, routine reports exhibiting the Company's dedication to reassuring the Commission that Dolly is committed to protecting Washington consumers and providing safe, reliable, and affordable service.

I look forward to your response.

Sincerely,
Armikka R. Bryant



Dolly, Inc.
General Counsel



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