

VIA FAX

Date Received: November 29, 1999

Docket No.: TV-991559

Company: Review of Rules Relating to Household Goods Carriers

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DOOR TO DOOR STORAGE

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You pack it up. We pick it up.

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

TO
STORAGE

November 29, 1999

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: Written Comments on Docket No. TV-991559, Motor Carriers of Household Goods

Dear Ms. Washburn:

Per your letter of October 29, 1999, this is to confirm the interest of Door To Door Storage, Inc. in participating in the new rulemaking. As your files will reflect in the previous docket in this matter, TV-971477, Door To Door Storage, Inc. is a containerized self-storage business which provides transportation as an integral part of moving self-packaged commercial or household goods from a business or residence to a central storage location. Door To Door Storage utilizes conventional flatbed equipment to transport the containers which allows the transportation of customer-packed and sealed containers from various locations to Door To Door's central warehouse.

As the Commission would acknowledge, the exclusion of this specialized type of service has had longstanding recognition in Commission regulations and rulings. Indeed, previous regulation

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6718 south 216th kent wa 98032 tele 253 872 5800 fax 253 872 2800 storestuff@doortodoor.com

Ms. Carole J. Washburn
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WAC 480-15-012 excluded the transportation of containcrized household goods from the definition of regulated household goods which was consistent with the Commission's Administrative Ruling No. 7 of December 10, 1959 wherein the Commission specifically defined "carrier of household goods" as "not includ[ing] authority to transport these commodities packed or crated, although such commodities may be transported although partially wrapped if the special protection, special handling, and special equipment usually employed in transporting household goods is required." As noted, no specialized household goods equipment is needed to move our customized containers.

Door To Door Storage thus feels that any change in WAC 480-15-020 to include "customer packed and sealed self-storage type containers" would reverse a longstanding precedent at the Commission and would be entirely contrary to the intent of the original rulemaking and the Governor's Executive Order mandate to make more customer choices available and would subject to regulation a new segment out of the industry which, under traditional definitional analyses, was always outside the ambit of Commission household goods regulation.

Door To Door Storage submits there is absolutely no justification for "repairing an unbroken wheel" by implementing an about-face on a definitional regulation that has served innovation in the industry so well. There is absolutely no evidence, other than what Door To Door believes are anecdotal conclusions by the traditional household goods industry that they are losing business to support any change in the regulation. Indeed, it appears that the motivation for advocating a

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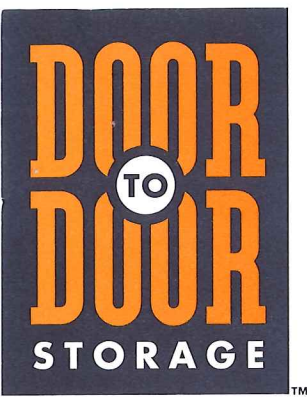
change to this rule stems largely from what Door To Door Storage believes is the traditional movers' concerns about diversion of business from an unregulated aspect of their service i.e. traditional storage, an activity over which the Commission has no jurisdiction.

We at Door To Door Storage appreciate the Commission's notification of this new rulemaking, and intend to be fully involved at the table in addressing any review of this important definitional rule and how it affects the overall regulated and unregulated marketplace. We believe the Commission's role in protecting the public interest and consumer interests are furthered, not hindered, by the current exclusion in the rule, and are prepared to present a considerable number of customer testimonials and evaluations in support of our existing portable storage business. We look forward to appearing at the upcoming stakeholders meeting December 9 and welcome the opportunity to tell our story to regulators and the consumer public alike.

Yours truly,



Tim Riley
President
Door To Door Storage, Inc.



You pack it up. We pick it up.

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STATE OF WASH.
UTIL. AND TRANSP.
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~~RECEIVED
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*RMD
K*

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Yours truly,

A handwritten signature in black ink, appearing to read 'Tim Riley', with a stylized flourish at the end.

Tim Riley
President
Door To Door Storage, Inc.