

Washington Movers Conference

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Keceive

James R. Tutton, Jr. Executive Director

October 19, 2020

Mr. Mark Johnson Executive Director/Secretary Utilities & Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Dear Mr. Johnson,

The Washington Movers Conference (WMC) is pleased to provide comments to UTC Docket **TV-200809**.

The Washington Movers Conference non-concurs with UTC proposed language for UTC HHG Tariff No. 15-C ITEM 15.

For proper and complete clarity for both Intrastate HHG Carriers and consumers they serve, the WMC proposes the following -

a. A draft definition of a HHG Shuttle needs to be added to ITEM 10 – Definitions, and could read something like the following –

"Household Goods Shuttle Service: A HHG shuttle service allows HHG Carriers to serve their customers who are moving into or out of homes that are difficult to access with a large transport vehicle such as tractor/trailer combination truck. The shuttle is the use of a smaller truck to transport the HHG from the larger truck thereby allowing the driver and crew to bring the smaller vehicle close to the residence to finish loading or unloading the customer's possessions as safely and efficiently as possible."

b. In addition, a new **Tariff ITEM (No. TBD)** – **HHG Shuttle Service,** should read similar to the following –

"When circumstances exist which prevent the carrier from using a standard tractor/trailer combination moving truck and a smaller vehicle is required, the carrier must discuss with the customer there is a need to provide smaller equipment and/or additional labor to be able to move the shipment between the point of origin or the point of destination and the carrier's vehicle. To accomplish the needed work, the carrier may charge the customer for these additional HHG

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Shuttle Service costs using the hourly rates listed in ITEM 230, as long as the carrier discloses the charges to the customer by use of a binding, nonbinding, or supplemental estimate and obtains the customer's signature before the work begins."

The foregoing would make the requirement for a "HHG Shuttle Service" fully understandable to Washington based intrastate HHG carriers, Consumers they work with, and the UTC Compliance Staff.

The WMC has no issue with UTC proposed language changes to UTC HHG Tariff No. 15-C ITEM 85.

Thank you for your consideration.

Sincerely,

James R. Tutton, Jr.

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