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**To:** [Hammond, Greg \(UTC\)](#)  
**Cc:** [Young, Mike \(UTC\)](#); [Maxwell, Amanda \(UTC\)](#); [Larry Nelsen](#); [Suetake, Nina \(ATG\)](#); [Records Management \(UTC\)](#)  
**Subject:** Your Memo to Docket TV-210535 and TV-210812 Pre-Dated May 26, 2022  
**Date:** Wednesday, May 25, 2022 12:42:32 PM  
**Attachments:** [TV-210535 and TV-210812 - Supplemental Notice.pdf](#)

External Email

Good Afternoon Greg –

Reference - [TV-210535 and TV-210812 Memo 01 - Revised.pdf](#)

You and other UTC Staff seem to be missing the point of the WMC Petition TV-210812 requesting a six-month study of Operating without the Maximum Rate Band contained in UTC HHG Tariff No. 15-C.

I have failed in my research to find any parameters or design of the six-month study granted to Clutter Inc. by the Commissioners at their Open Meeting on October 14, 2021.

You may or may not understand the Washington Regulated Intrastate HHG Moving Industry is different from other Transportation Industries regulated by the UTC. Before any consumer’s intrastate HHG relocation is performed by a UTC regulated HHG carrier, the consumer must approve and sign a properly completed Estimated Costs of Services Form. (Ref. WAC 480-15-360) If the consumer doesn’t like what he sees in the rates and charges on the provided Estimate, he/she can further discuss the Estimate with the HHG carrier or contact another regulated HHG carrier for an Estimated Costs of Services. That is referred to as “Competition” with the consumer in charge!. The regulated intrastate HHG industry in Washington State is very competitive and has appropriate Consumer Protections in place.

Consequently, removing the Maximum Rate Band temporarily for a six-month study will not have a negative impact on consumers. Rather, regulated intrastate HHG carriers will have an opportunity to manage their rates being provided to consumers that are compensatory based on business costs in their operating area that are continually changing,

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either upward or downward.

You and your staff simply don't either have the time nor the resources to react quickly to constant Petitions submitted by the WMC when business costs change outside of the control of the regulated intrastate HHG carrier.

Results from the requested six-month study will simply show either increased complaints received at the Commission from consumers complaining of excessively high moving rates and charges or no complaints from consumers. Professional, regulated intrastate HHG carriers know their business and their businesses costs. In applying rates and charges to consumers, they are not in the business of gouging their customers. If they did, they would no longer have that customer as a potential return customer nor would the customer likely recommend that HHG carrier to relatives or friends. Again, that is "Competition".

This is not rocket science folks. This is a Petition request for a Six Month Study to see how operating without the Maximum Rate Band in the HHG Tariff No. 15-C will be accepted by consumers. If there is an identifiable problem with the study while in progress, it can be immediately cancelled.

It's not about the past data you have requested in the attached Memo "TV-210535 and TV-210812 – Supplemental Notice.pdf". It's about today's extraordinary cost increases (Fuel, Packing Material and Employee Costs) facing regulated intrastate HHG carriers with no relief options presently available. These cost increases are in the news media almost every day plus factually being provided to you by my emails with appropriate relatable attachments. I don't make this stuff up.

Current HHG Tariff No.15-C HOURLY RATES (ITEM 230) and MILEAGE RATES (ITEM 200) were last updated on February 21, 2020.

Its time for the UTC to realize "these times they are a changing". Its not business as usual in 2022 that requires long drawn out rate studies to

determine if an individual rate item needs to be changed. Social and news media and other federal and state government entities assist in informing how a transportation business's operating costs may be changing or what the consumer may expect when selecting a regulated HHG mover in real time. Consumers know fuel costs have skyrocketed in recent months and you should too.

I strongly suggest you revise your recommendation before tomorrow's UTC Open Meeting. I am not comfortable participating in an industry discussion meeting with the impact the decision will have on that industry that already has a **pre-dated** resolution/decision.

Maybe tomorrow's Open Meeting should be rescheduled.

Jim Tutton, Jr., Executive Director  
WMC

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