

WILLIAM P. McARDEL III

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A T T O R N E Y A T L A W

1826 114th Avenue NE
Suite 101
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February 27, 2015

Washington Utilities and
Transportation Commission
1300 South Evergreen Park Drive
PO Box 47250
Olympia, WA 98504-7250

Re: Objection to Household Goods Moving Company Permit Application of
 Western Transfer of Washington, LLC
 ID #16840 Docket TV - 150148

Dear Sir or Madam:

I am the attorney for Western Van Lines, Inc., and the purpose of this letter is to communicate to the Washington Utilities and Transportation Commission ("WUTC") my client's objection to the pending permit application referenced above. My client's objection is to the legal name of the entity, which is confusingly similar to the legal name and trade name of my client. My client's legal name is Western Van Lines, Inc., and my client's trade name is Western Van Lines.

For the above-referenced applicant to use the name "Western Transfer of Washington, LLC" would cause needless confusion both within the industry and in the consuming public.

My client has no objection to the trade name "Morgan Transfer Moving and Storage", which I understand to be the trade name of an existing company in the household goods moving industry which is being sold to the applicant. The obvious solution to my client's objection is for the applicant to change its legal name by deleting the word "Western" and substituting a dissimilar word, such as "Morgan". If the applicant deleted the word Western on its application and substituted some dissimilar word, my client would withdraw this objection.

Pursuant to WAC 480-15-340, the following is provided concerning my client as the objecting party:

Western Van Lines, Inc.
8521 S. 190th, Kent WA 98031
Phone: (425) 251-3400 or (877) 634-9769
Fax: (425)251-3429
Email: info@westernvan.com
Permit Number: HG84

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Due to the nature of my client's objection, this objection is based upon WAC 480-15-340(3)(b), regarding Public Interest and (d) regarding Business Practices. My client believes the public interest is best served by requiring the applicant to change its name in order to avoid any unnecessary confusion of the business names or the entities associated with those names. For the same reason, my client believes that requiring the applicant to change its name to avoid confusion is consistent with the best Business Practices element of the Commission's authority. If the Commission believes that my client's objection falls within any of the other categories designated under WAC 480-15-340, then such provisions are hereby incorporated in this objection.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "W. P. McArdel III". The signature is fluid and cursive, with a large initial "W" and a distinct "P" and "M".

William P. McArdel III

WPM/jw
23.5334.01

This Objection is dated this 27th day of February, 2015 and signed at 1826 114th Avenue NE, Suite 101, Bellevue, WA 98004-3003.