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December 14, 2021

VIA ELECTRONIC FILING

Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Inquiry to determine the appropriate process for clarifying whether Chapter 480-15 WAC allows household goods carriers to contract with third parties to provide services regulated by the Commission.
Docket No. TV-210737

Comments of Clutter Inc.

Dear Executive Director and Secretary Maxwell:

Clutter Inc., (“Clutter”) appreciates the opportunity to provide comments pursuant to the Washington Utilities and Transportation Commission’s (“Commission”) November 16, 2021, Notice of Opportunity to File Written Comments in this Docket.

Clutter responds to the Commission’s questions as follows:

1. Do you currently contract with third parties to provide either regulated household goods services or non-regulated services?

Clutter does not currently contract with third parties to provide regulated or unregulated services to its customers in Washington state.

2. If you contract with third parties to provide regulated services, how do you ensure compliance with Commission rules related to background checks, safety requirements, etc.?

N/A

3. If you do not currently contract with third parties to provide regulated services, are you interested in contracting with third parties to provide those services in the future?

While Clutter does not currently contract with third parties to provide either regulated or unregulated services in Washington state, Clutter recognizes that there could come a time or situation where Clutter may desire to contract with third parties to serve its customers if allowed by WAC 480-15 and Tariff 15-C.

4. If you are interested in using third parties to provide regulated services, what services would you consider using third parties to provide?

Clutter does not currently have any plans to contract with third parties to provide services in Washington state and is unable to give a specific example of the services a third party would provide. Clutter does note that attracting qualified employees is growing more and more difficult, and having the flexibility in WAC 480-15 and Tariff 15-C to contract with a third party could be beneficial to household goods movers.

5. If you contract with third parties to provide non-regulated household goods services, how are those relationships structured? For example, how is payment rendered? Do you conduct background checks?

If Clutter were to contract with a third party to provide regulated or unregulated services, and it was allowed by WAC 480-15 and Tariff 15-C, Clutter assumes that any person providing such contract services would need to meet the same standards as Clutter employees, meaning that proof of background checks, compliance with safety rules and regulations and other qualifications would need to be provided before services can be performed. Clutter also understands that the licensed household goods carrier is ultimately responsible for compliance with WAC 480-15, Tariff 15-C and applicable law, whether the services are provided by Clutter employees or a third party contractor.

6. If you are a potential third-party contractor, how do you conduct background checks, and what safety requirements do you have in place to protect customers and employees?

N/A.

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Cable Huston LLP
TV-210737
December 14, 2021
Page 3

Clutter looks forward to working with Staff and other stakeholders in this docket and appreciates the opportunity to provide these comments.

Thank you for your assistance.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Chad M. Stokes", with a stylized flourish at the end.

Chad M. Stokes
Attorneys for Clutter

CMS:bh

cc: Clutter Inc. (*via e-mail only*)
Service List (*via e-mail only*)