

## Pennsylvania Moving & Storage Associates



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September 5, 2014

Rosemary Chiavetta  
Secretary of the Commission  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, Pennsylvania 17105-3265

Ref: Enbanc Hearing 8/28/14

Dear Commissioners,

Attached comments regarding above meeting.

Thank you for your time and consideration. If we can be of any further assistance, please do not hesitate to advise.

Sincerely yours,

J W McGrath  
PMSA  
Executive Director

Pa. address 1110 Baltimore Pike  
Glen Mills, Pa. 19342

CC:  
PMSA Board of Directors  
PMSA Membership  
AMSA  
INTERESTED PARTIES

### FINAL RULE MAKING NOTICE FROM THE PUC

One of the main concerns of the PUC and the Moving & Storage Industry should be the consumer and their employees.

Most industry members don't take exception with the final rule making, but do have a number of concerns, which has been communicated to the Governor's office, the legislature and the IRRC.

Some of the concerns are, but not limited to the following:

In the proposed new application process, there should be a stipulation that if authority is granted, the applicant should establish a place of business within the commonwealth of Pa. [see pg. 9 of the final order]. This would allow for consumer protection, proper enforcement, tax revenue for the commonwealth, employment for Pa. residents, community involvement, to name a few. It is our understanding that all present certificated carriers will be grandfathered in, so there for not offending any present out of state carriers, most of who border Pa. & have authority in other states, including New Jersey.

Rogues: [refer to page 12 of the final rule order] submission of these illegal operators, happens on a weekly basis to the enforcement arm of the PUC. So being vigilant is not the answer, increase the fines, stop them from doing business within the Commonwealth > the enforcement group does the best job they can with the tools they are provided with. In our estimation , in today's world they need a TECHNOLOGICAL INDIVIDUAL, to search the web for illegals on Angies list , Craig's list , Yelp on a daily basis , to name a few . If the intent of this final rule making order is to create competition and a market place for the consumer, then these ROGUE'S, need to be corralled. These individuals and companies prey on the public, utilizing criminal activity to reach their goal. They will not be applying for authority under any umbrella, when they can operate without paying for what the LEGITIMATE carriers have to. **Utilize the State Police, Div. of Motor vehicles, Dept.'s of Revenue & Tax, Dept. of Insurance and the IRS. Be sure that they are complying with state and federal laws.**

Page 6 & 7 of the final rule & I para phrase, increase the minimum liability coverage to the Federal and NUMEROUS other states to \$750,000. Most insurance carriers & brokers who write this insurance within the industry won't offer policies under 1 million. **Why not include workman's comp. as part of the application process. ? This will protect both the employees and consumers.**

Another suggestion was to have a tax incentive to offset the loss of the authority value.

The Governor has recently issued a few press releases in regards to State investment and funding for the Airports and Railroad projects , where he states , " Providing transportation options is vital to moving goods and people ." Transportation is a proven economic driver and these investments will help, these companies maintain and create more jobs ". Upgrade to the airport facilities, support more than 8,400 jobs and in the railroad projects nearly 34,000 jobs. This holds true in the Moving & Storage industry, and related partners maybe to the tune of 5,000 jobs or more. **Should the state legislature in conjunction with the PUC seek support and funding to insure the assets of the moving industry are intact?**

If the intent to change the existing process[ in place for at least the last 30 yrs. ] is to create competition , and a level playing field for all , then do utilize what other states do [ as referenced in the final rule order ] and make it a change for all .