

# BELLHOPS

Bellhops, Inc.  
1110 Market Street, Ste 502  
Chattanooga, TN 37402  
July 23, 2019

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Second Floor  
Harrisburg, PA 17120  
(717) 772-7777  
www.puc.pa.gov

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JUL 29 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Docket No. A-2019-3011341 – Bellhops Moving, LLC Data Request**

Secretary:

In a letter dated July 8, 2019, the Pennsylvania Public Utility Commission (the "Commission") requested that, pursuant to 52 Pa. Code Section 1.36, Bellhops Moving, LLC (the "Company") verify the answers on its application for household goods motor carrier authority. It is our understanding that we previously did submit the required verification under Section 11 of the application and the last page of the verified statement. However, out of an abundance of caution, we have attached a newly signed copy of the application for motor common carrier of household goods in use. Please let us know if this does not correct the issue as soon as possible.

The July 8, 2019 request also asked that the Company respond to the following question:


- 1. You stated your desire to operate on a state-wide basis; however, your lack of a Pennsylvania [location] raises concerns. Please explain your plan to render safe, efficient, and reasonable service in the Pennsylvania [sic] from your Tennessee location. If you intend to open facilities in Pennsylvania, please provide specific details on when, where, and how.**

In response, the Company states as follows:

Bellhops Moving, LLC plans to hire a market manager to reside in the Philadelphia area and oversee all Philadelphia operations. This individual will ensure that all drivers demonstrate competency in working and communicating with customers and that they successfully pass a road test and understand and abide by their responsibilities in conducting pre- and post-driving inspections. The market manager will also ensure that the drivers are trained in defensive driving techniques and understand how to safely secure each load for shipment. We plan for the market manager to conduct random audits of drivers and movers to ensure that they are providing only the highest quality services for customers. Bellhops Moving, LLC is also considering the possibility of obtaining a local office in Philadelphia to rent/lease, which would serve as the company's base for its Philadelphia operations. However, Bellhops Moving, LLC has not obtained such a location at this time.

I trust that this letter is fully responsive to your concerns. Please do not hesitate to contact me directly with any additional questions or concerns. I can be reached at (615) 594-3150 or at [dustin.carlton@getbellhops.com](mailto:dustin.carlton@getbellhops.com).

Thank you,

A handwritten signature in black ink, appearing to read 'Dustin Carlton', with a stylized flourish at the end.

Dustin Carlton  
VP, Legal & Compliance

**BELLHOPS**

# APPLICATION CHECKLIST

## Motor Common Carrier or Motor Contract Carrier Of Household Goods in Use

Use this checklist to make sure you have enclosed all required items or your application will not be processed. You cannot operate in Pennsylvania until you receive a Certificate of Public Convenience from the Commission.

- The original Application with original signatures (unless eFiled with the Commission's online eFiling system at [www.puc.pa.gov](http://www.puc.pa.gov) )
- Applicant's Verified Statement.
- A certified check, money order, or check from your attorney for \$350 made payable to "Commonwealth of Pennsylvania;" *Previously Sent*
- ~~IF application is being made as an individual or sole proprietor.~~
- ~~IF application is being filed by a Partnership, provide a list of the names and addresses of ALL partners.~~
- ~~IF application is being filed by a Limited Partnership, provide a list of names and addresses of ALL partners, and your PA Corporation Bureau Entity ID Number.~~
- ~~IF application is being filed by a Limited Liability Partnership, provide a list of names and addresses of ALL partners, and your PA Corporation Bureau Entity ID Number.~~
- IF application is being filed by a Limited Liability Company, provide a list of the names and addresses of ALL members and the Title of each member, and your PA Corporation Bureau Entity ID Number.
- ~~IF application is being filed by a Corporation for Profit, provide a list of ALL corporate officers and titles, the name of each shareholder, distribution of shares, and your PA Corporation Bureau Entity ID Number.~~
- ~~IF application is being filed by a Corporation Non-Profit, provide a list of ALL corporate officers and titles and those serving on the Board of Directors, and your PA Corporation Bureau Entity ID Number.~~

If not eFiled, mail your application and attachments to:

Secretary, PA Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pennsylvania 17120

Corporate entities (corporations, LPs, LLPs, and LLCs) and fictitious trade names must be registered with the PA Department of State. Companies incorporated in other states must register as a foreign business corporation. Individuals acting as sole proprietors and partnerships do not have to register.

If you are not registered with the PA Department of State, you can apply at its website at [www.dos.state.pa.us/corps](http://www.dos.state.pa.us/corps) on how to do business in Pennsylvania as:

PA Corporations (Profit and Non-Profit) – apply for Articles of Incorporation

Foreign Corporations – apply for a Certificate of Authority

PA Limited Partnerships (LPs), Limited Liability Partnerships (LLPs), and Limited Liability Companies (LLCs) – apply for an Application of Registration

Fictitious Name Registration – File ONLY IF Trade Name will be different than the business name you register with the PA Department of State.

## **General Information for Preparing and Filing the Application for Motor Common Carrier or Motor Contract Carrier of Household Goods in Use.**

1. This application is required to request a Certificate of Public Convenience (for Common Carriers) or Permit (for Contract Carriers) to operate as a commercial carrier of household goods in use.
2. Upon approval of the application, you will be notified that prior to providing service in Pennsylvania you must submit evidence of insurance to the Public Utility Commission. **Your permanent evidence of insurance will be a Form H for cargo insurance and a Form E for bodily injury and property damage insurance.** These forms are mailed to the Commission directly from the home office of your insurance carrier. The name and address on your insurance forms must **exactly** match the name and address you have provided on your application. If your insurance company subscribes to NOR (National Online Registries, Inc. at [www.mcinfo.org](http://www.mcinfo.org)), you can request the insurance company to file the required insurance forms electronically through NOR. The electronically filed insurance forms will reach the Commission more quickly than mailed forms. The minimum limits of insurance are as follows:
  - a. Bodily Injury - The liability of the insurance company on each motor vehicle operated in common or contract carrier service shall be in amounts not less than \$300,000 per accident for a vehicle with a manufacturer's gross vehicle weight rating of 10,000 pounds or less, in the case of a single vehicle, or a manufacturer's gross combination weight rating of 10,000 pounds or less, in the case of an articulated vehicle. The liability of the insurance company on each motor vehicle operated in common or contract carrier service shall be in amounts not less than \$750,000 per accident for a vehicle with a manufacturer's gross vehicle weight rating over 10,000 pounds, in the case of a single vehicle, or a manufacturer's gross combination weight rating over 10,000 pounds, in the case of an articulated vehicle.
  - b. Insurance coverage of motor carriers of household goods shall meet the requirements of 75 PA C.S. §1711 (relating to required benefits).
  - c. Cargo - \$5,000 for loss or damage to cargo being transported.

Revised 7/17/17

## Application for Motor Common Carrier or Motor Contract Carrier of Household Goods in Use.

THIS APPLICATION IS REQUIRED TO REQUEST A CERTIFICATE OF PUBLIC CONVENIENCE (FOR COMMON CARRIERS) OR PERMIT (FOR CONTRACT CARRIERS) TO OPERATE AS A COMMERCIAL CARRIER OF HOUSEHOLD GOODS IN USE.

1. **Legal Name of Applicant** (Individual, Partnership or Corporation)

Bellhops Moving, LLC

- If you are an individual who has not formed any type of corporate entity, you should enter your name **as it will appear on your insurance documents**.
- If you are filing for a partnership, but **not a limited liability partnership**, the names of all partners must be entered on this line. Those names should be entered **as they will appear on your insurance documents**. This includes husbands and wives filing jointly.
- If you are filing for a corporate entity (corporation, limited liability company, or limited liability partnership), **even if you are the sole shareholder member**, you must enter the name **exactly as it appears on the registration papers from the Corporation Bureau of the Pennsylvania Department of State**.

2. **Trade Name** (Attach a copy of fictitious name registration if applicable)

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This is any name which you will be operating under which differs from the **LEGAL NAME OF APPLICANT**. A **TRADE NAME** is considered a **FICTITIOUS NAME** if the identity of the applicant cannot be readily determined. *EXAMPLE: John Doe is the applicant and wants to use the name "Johnboy Trucking" as his trade name. People cannot readily determine that John Doe is the actual operator; therefore, the name is fictitious and must be registered as such. Trade names such as "John Doe Trucking" or "J. Doe Trucking" are not considered fictitious and would not have to be registered.*

3. **Do you currently hold PUC Authority? NO Previous Authority? NO**

If YES, at PUC No. A- \_\_\_\_\_

4. **Are you a business entity registered with the PA Dept. of State? YES**

If NO, you must register (see checklist on how to register)

If YES, provide your PA Corporation Bureau Entity ID Number **6900794**

(See checklist and indicate type of business entity registered)

5. **If either a corporation or limited liability company please list members (LLC) or shareholders and officers (corporation).**

Bellhops, Inc. – Sole Member  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6. **Physical Address** (do not use PO Box)

1110 Market Street, Suite 502  
Street Address

Chattanooga, TN 37402  
City, State and Zip Code

423-464-6401  
Telephone Number

Hamilton  
County

The address entered here should be the actual location of the business. This is the address the Commission needs in order to dispatch Enforcement Officers to inspect equipment.

7. **Mailing Address** (if different from Physical Address)

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
City, State and Zip Code

This is the address to which the Commission will send all official documents issued by the Commission. If left blank, it will be assumed that the **MAILING ADDRESS** is the same as the **PHYSICAL ADDRESS**.

8. **Attorney** (if applicable)

\_\_\_\_\_  
Attorney's Name & Telephone Number for this Filing

\_\_\_\_\_  
Attorney's Address

An attorney's name should only be entered if an attorney is filing the application for a client and the application is being sent under the attorney's cover letter.

9. **Does applicant have a USDOT Number?**

     No                        X   Yes, at No. **3296538**

Obtaining it simultaneously – different process (USDOT obtained through URS system); MC via Form Op-1  
Need DOT to file Form OP-1

10. **Describe the service area proposed by this application.**  
(Use the space below or attach additional sheet if space provided is not sufficient).

\_\_\_\_\_

To transport household goods in use between points in Pennsylvania.  
To transport household goods in use from points outside of Pennsylvania to points in Pennsylvania and vice versa.

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*Examples:*

- *To transport household goods in use between points in Pennsylvania.*
- *To transport household goods in use from points in Centre County to points in Pennsylvania, and vice versa.*

**11. Certification:**

Applicant certifies that it is not now engaged in unauthorized intrastate transportation for compensation between points in Pennsylvania and will not engage in said transportation unless and until authorization is received from the Pennsylvania Public Utility Commission.

Applicant further certifies that it understands the requirements of the Pennsylvania Public Utility Commission, especially as they relate to safety and insurance and that it may be subject to civil penalties, suspension or cancellation of the Certificate for failure to comply with Commission requirements.

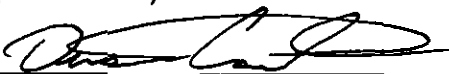
Applicant further certifies that it understands that it is subject to an annual assessment based upon its reported gross Pennsylvania intrastate revenues; said assessment to help defray expenses incurred in regulating Motor Common Carriers of Household Goods in Use; and acknowledges that failure to report revenue and pay its annual assessment may result in civil penalties, suspension or cancellation of the certificate.

**Verification of Application**

I/We hereby state that the statement(s) made in this application is/are true and correct to the best of my/our knowledge and belief.

The undersigned understands that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

Dustin Carlton, Secretary  
(Print Name)

  
(Signature)

7/23/19  
(Date)

The verification of the application must be completed by the applicant appearing on Line 1 of the application by the named individual, all partners if a partnership, a member (if a limited liability company), or by the President or Secretary (if a corporation).



## VERIFIED STATEMENT OF APPLICANT

THE FOLLOWING INFORMATION IS REQUIRED BY THE COMMISSION TO DETERMINE THE APPLICANT'S FITNESS TO OPERATE. STATEMENTS SHOULD BE TYPED OR PRINTED. ILLEGIBLE STATEMENTS WILL DELAY YOUR APPLICATION.

**Bellhops Moving, LLC**

Legal Name of Applicant

Trade Name, if any

**1110 Market Street, Suite 502**

Street Address (principal place of business)

**Chattanooga**

City or Municipality

**TN 37402**

State

Zip Code

The Verified Statement of the Applicant factual details about your proposed transportation service. Your Verified Statement must answer all of the items listed below and on the following pages. Provide as much information as possible to prevent delay in processing your application. If you need more space to provide your answer, please attach additional pages identifying the appropriate item number.

1. Identify the person making the Verified Statement on behalf of the applicant. If an employee/officer of applicant is making the statement, give name, title, business address and telephone number.

**Dustin Carlton – Secretary  
1110 Market Street, Suite 502  
Chattanooga, TN 37402  
423-464-6401**

2. List the applicant's affiliation (owner, manager, controls) with any other carrier, with the description of affiliation.

**Bellhops Moving, LLC is a wholly owned subsidiary of Bellhops, Inc., a federally licensed property broker, which has arranged for the transportation of property by property carriers in Pennsylvania since 2016.**

3. Please provide evidence of minimum of two-years' experience with a licensed household goods carrier as required by 52 Pa. Code §3.381(c)(1)(iii)(A)(II)(-I-).

**As set forth above, Bellhops Moving, LLC is a wholly owned subsidiary of Bellhops, Inc., a federally licensed property broker (which has also submitted an application for household goods brokerage authority in Pennsylvania, as a result of its intention to broker household goods moves to its subsidiary, Bellhops Moving, LLC). Bellhops, Inc. (formerly Campus Bellhops, LLC) began operations in 2011 by arranging for independent third party lumpers to provide loading and unloading services to customers requesting residential and office moves. During its initial operations, Bellhops, Inc. neither provided motor carrier services nor arranged for third parties to provide transportation services. However, as a result of customer requests for transportation services in connection with loading and unloading, in 2016, Bellhops, Inc. began offering full service moves itself as an authorized household goods ("HHG") motor carrier in select markets (though Bellhops, Inc. has never operated as a HHG motor carrier in Pennsylvania). Bellhops, Inc. also began brokering property transportation services to third party service providers (as it has done in Pennsylvania since 2016). Since beginning its operations, Bellhops, Inc. has either performed or successfully brokered over 150,000 moves to customers in more than 25 states (including Pennsylvania) with an average star rating of 4.8/5 (on a scale of 1-5). Bellhops, Inc.**

would like to begin offering, through its wholly owned subsidiary, full household goods moving services in Pennsylvania, including transportation on Bellhops owned or leased trucks.

4. Describe your facilities, record maintenance plan and your communication network. Please include a description of your physical location, to including office machines that will be utilized, and the facility to house vehicles. As a carrier of household goods in use, applicant should include a description of storage facilities, if applicable. Please include an explanation of your plan to maintain records required by the PUC, as well as normal business records. In regard to your communication network, please explain how you will receive customer requests for transportation, how you will dispatch the vehicles to fulfill the request, and how you will maintain continuous communication with your drivers.

**Bellhops Moving, LLC is owned and operated by Bellhops, Inc., which is headquartered at 1110 Market Street, Suite 502, Chattanooga, TN 37402. All records of Bellhops Moving, LLC will be stored and retained in accordance with applicable law at the foregoing location. The Chattanooga office will house all files in physical and/or electronic folders with all electronic databases being backed up securely. Files will include, but are not limited to, to the extent required by applicable law, all written documentation of reportable accidents, employee personnel files, driver qualification files (including motor vehicle records and any required physicals or verified employment histories), any applicable driver logs, required maintenance and inspection reports, proof of insurance documents, etc. All records will be maintained in accordance with applicable data retention laws.**

**With regards to communication, Bellhops Moving, LLC will receive customer order requests from its parent, Bellhops, Inc. Customers may place orders for services via phone or over the internet at [www.getbellhops.com](http://www.getbellhops.com). After an order has been placed, Bellhops, Inc. will arrange for Bellhops Moving, LLC to provide the moving services and will communicate the details of the order to Bellhops Moving, LLC and its workers. Bellhops, Inc. will use the same technology platform that it has successfully used for the past 2 years in Pennsylvania to ensure customer requests for services are matched with Bellhops Moving, LLC carriers who are ready, willing, and able to fulfill customer orders. Bellhops Moving, LLC will dispatch drivers of motor vehicles (primarily 15-26 ft box trucks) and will be in continuous communication with drivers via the Bellhops mobile application and via text and cell phone communication. Bellhops Moving, LLC will also hire an in-market general manager to manage and ensure quality.**

5. Please state the number of drivers you intend to use or hire in your business and explain why that number of drivers is appropriate for the size of the territory you will be serving. In addition, please explain:

**Bellhops Moving, LLC will initially use or hire approximately 3-4 drivers. We estimate that Bellhops Moving, LLC will perform about 40 full-service moves per month based on Bellhops, Inc. historical data. The company would like to have 3-4 drivers to ensure that someone is always available to drive a truck.**

**Bellhops Moving, LLC intends to work with Hub International (“Hub”), an insurance broker with significant experience in the transportation industry, and/or National Transportation Consultants, Inc. (“NTCI”), a third party consulting group, to ensure that the following programs will comply with applicable law. In addition:**

- a. Your hiring standards for drivers;

**All drivers must be physically and medically qualified under the Federal Motor Carrier Safety Regulations (as adopted by Pennsylvania). Moreover, all drivers must be at least 21 years of age or older and must successfully pass a criminal background and motor vehicle records check. In addition, drivers must demonstrate competency in working and communicating with customers and must pass a road test.**

- b. Your system for conducting criminal background checks;

**Bellhops Moving, LLC will use a third party service provider, such as Checkr, to conduct criminal background checks on all drivers.**

- c. Your driver training program;

The company intends to work with Hub and/or NTCI to develop a driver training program that is compliant with applicable law. All drivers will be trained on and certified in the general operation of all motor vehicles used by the company and will be expected to abide by defensive driving principles. In addition, drivers will be required to know how to block, brace, and tie down cargo and will be required to pass a road test. Further, drivers will be trained on driver qualification requirements, hours-of-service restrictions, and vehicle maintenance and inspections, among other topics. The company intends for its program to include recurrent training to ensure drivers remain up-to-date on all applicable regulations.

- d. Your system for conducting driver license checks;

Bellhops Moving, LLC will use a third party service provider, such as Checkr, to conduct motor vehicle records and driver's license checks. Motor vehicle records will be reviewed at least annually in accordance with applicable law.

- e. Your policies regarding alcohol and drug use by your drivers.

Bellhops Moving, LLC has a drug and alcohol-free workplace policy that applies to all drivers and movers who work in the field. The company explicitly prohibits: (i) the use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication taken or possessed without a prescription on customer premises or whenever performing a work assignment; (ii) being impaired or under the influence of legal or illegal drugs or alcohol away from the company or on customer premises if such impairment or influence adversely affects the individual's work performance, the safety of the individual or others, or puts at risk the company's reputation; and (iii) the presence of any detectable amount of prohibited substances in the individual's system while at work, while on the premises of company customers, or while on company business. "Prohibited substances" include illegal drugs, alcohol, or prescription drugs not taken in accordance with a prescription given to the individual. Notwithstanding anything herein to the contrary and for the avoidance of doubt, legal, over-the-counter drugs may be taken without a prescription in accordance with their permitted use where such use does not adversely affect the individual's work performance, the safety of the individual or of others, or risk the company's reputation.

Bellhops Moving, LLC may conduct drug and/or alcohol testing, including pre-employment, random testing, for-cause testing (e.g., if the company has reason to believe that the individual may be under the influence of drugs or alcohol), and post-accident testing. If an individual is tested for drugs or alcohol and the results indicate a violation of company policy, or if an individual refuses a request to submit to testing, the individual may be subject to appropriate remedial action.

6. Please state the number of vehicles you plan to use in your business and why that number is appropriate to provide reasonable and efficient service to the territory you will be serving. If you have already obtained vehicles for your business, please list them in the chart below.

Bellhops Moving, LLC plans to rent two (2) vehicles from equipment lessors, one 16 ft truck and one 26 ft truck. We estimate that Bellhops Moving, LLC will perform about 40 full-service moves per month based on Bellhops, Inc. historical data. The company would like to have 3-4 drivers to ensure that someone is always available to drive a truck.

<u>YEAR</u>	<u>MAKE</u>	<u>MODEL</u>	<u>SEATING CAPACITY*</u>	<u>VEHICLE ID #</u>	<u>MILEAGE</u>


7. Describe your vehicle safety program. Please include the following in your explanation:
  - a. Your periodic vehicle maintenance plan
  - b. Your system for ensuring your vehicles will continuously comply with applicable Pennsylvania vehicle equipment standards (67 Pa. Code, Chapter 175).

**Bellhops Moving, LLC will be renting all motor vehicles from third party equipment lessors who will be responsible for maintaining the safety of all vehicles. Bellhops Moving, LLC will work with the equipment lessors to ensure that all leased vehicles have in fact passed all semi-annual inspections and any other inspections required by law and have been systematically maintained. Bellhops Moving, LLC will also require that all of its drivers conduct all required visual inspections of the vehicle (e.g. pre-trip and post-trip inspections).**

8. Please explain what steps you have taken to determine if you can obtain insurance and pay the required insurance premiums.

**Bellhops Moving, LLC has solicited underwriters for full auto insurance, providing liability coverage of at least \$750,000. The company has also solicited underwriters for cargo insurance in the amount of at least \$5,000 per vehicle and \$10,000 per occurrence. Insurance premiums will be paid by Bellhops, Inc. Financial data for Bellhops, Inc. is provided in this application.**

9. State whether the applicant has been convicted of a misdemeanor or felony. If applicant is partnership, limited liability partnership, corporation, or limited liability company this question applies to all members, officers, and/or shareholders. If "YES", explain.

NO

10. Financial Data. Complete the "Statement of Financial Position", which follows this page. Please feel free to also provide additional information explaining why you believe you have sufficient funds to ensure your transportation business can provide reliable service to the public in a safe manner.

**The financial data for Bellhops, Inc. is disclosed below. Bellhops Moving, LLC is owned and operated by Bellhops, Inc., which has successfully operated and provided reliable services to the public since 2014. Indeed, Bellhops, Inc. now operates in more than 25 states and has consistently produced some of the highest ratings for customer satisfaction in the industry.**

### Verification of Statement

The undersigned deposes and says that he/she is authorized to and does make this verification and that the facts set forth therein are true and correct to the best of his/her knowledge, information, and belief. The undersigned understands that false statements herein are made subject to penalties of 18 Pa. C. S. Section 4904 relating to unsworn falsification to authorities.



(Signature)

*Dustin Carlton, Secretary*

(Name and Title, printed or typed)

7/23/19

(Date)

Bellhops, Inc.  
Attn: Legal  
1110 Market Street  
Suite 502  
Chattanooga, TN 37402



Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120