

BELLHOPS

Bellhops, Inc.
1110 Market Street, Ste 502
Chattanooga, TN 37402
August 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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AUG 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Docket No. A-2019-3012153 – Bellhops Moving, LLC Data Request

Secretary:

In a letter dated August 14, 2019, the Pennsylvania Public Utility Commission (the "Commission") requested that Bellhops Moving, LLC (the "Company") respond to four questions. Each of them is addressed in turn.

- 1. Although you have explained your intention to hire a market manager, or to possibly secure a physical office location; you have not explained how and where vehicles will be stored. Please provide said information.**

The Company intends to negotiate a lease for a physical office location where such lease would provide the Company with the right to store its leased vehicles on the parking lot for such leased location. In the absence of such office lease, the Company will explore entering into other leasing contracts providing the Company with parking rights, including, but not limited to, an arrangement with the truck leasing company (e.g., Ryder) that would provide the Company with the right to return the vehicle to the lessor's premises each day (to which Ryder has indicated that they would be agreeable). Company employees will be required to park the vehicles in only those parking areas where the Company has been granted the right to store such vehicles.

Company employees will also be required to safely secure and lock up each vehicle after its use and upon its return to its designated parking area.

2. In your verified statements you indicate that, "customer requests for services are matched with Bellhops Moving, LLC carriers who are ready, willing, and able to fulfill customer orders." This raises questions:

- a. Who exactly are the "carriers" Bellhops Moving, LLC will be "matching" customer requests with? Is Bellhops Moving, LLC not ITSELF the carrier?**
- b. Are the drivers hired and employed DIRECTLY by Bellhops Moving, LLC?**

The only motor carrier would be Bellhops Moving, LLC. The Company will match customer requests with the Bellhops Moving, LLC authorized drivers who have availability to provide services on the day and at the time requested by the customer.

Yes, the drivers will be hired and employed directly by Bellhops Moving, LLC.

3. What actions have you undertaken to ensure that whatever company you intend to rent vehicles from has inspection and safety standards that meet Commission requirements?

The Company will only be renting/leasing vehicles from reputable equipment leasing companies such as Ryder, Penske, etc., which have established histories of providing safe vehicles. Indeed, the Company is currently working on a rental relationship with Ryder, and it is our understanding that every Ryder unit is subjected to a mandatory inspection to insure that it is safe to operate and in compliance with DOT and state laws and regulations. Further, Ryder tracks all of its service information and stated that it will provide the Company with a full repair history for each vehicle upon request. The Company will secure, at a minimum, copies of all required annual inspections for all rented/leased vehicles and will perform pre- and post-driving inspections and report any issues needing maintenance and repair. (See, e.g., attached Driver Vehicle Inspection Report). Ryder has stated that it would make such repairs identified in a pre- or post-driving inspection to ensure that the vehicles remain in safe operating condition.

4. Have you consulted with your intended insurer to verify that you will be able to submit the required Form E insurance filing? In nearly all instances, companies find it difficult or impossible to obtain an acceptable Form E filing to cover rented vehicles.

Yes, we have consulted with our insurance broker and underwriter and have verified that we will be able to submit the required Form E insurance filing. We have attached a copy of an email confirming this fact.

I, Dustin Carlton, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

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.

Thank you,



Dustin Carlton
VP, Legal & Compliance

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Enclosures:

- Sample Driver's Vehicle Inspection Report
- Underwriter Email

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Driver's Vehicle Inspection Report

Check ANY Defective Item and Give Details under "Remarks."

DATE: _____

TRUCK/TRACTOR NO. _____

- | | | |
|--|--|--|
| <input type="checkbox"/> Air Compressor | <input type="checkbox"/> Horn | <input type="checkbox"/> Springs |
| <input type="checkbox"/> Air Lines | <input type="checkbox"/> Lights | <input type="checkbox"/> Starter |
| <input type="checkbox"/> Battery | Head – Stop | <input type="checkbox"/> Steering |
| <input type="checkbox"/> Brake Accessories | Tail – Dash | <input type="checkbox"/> Tachograph |
| <input type="checkbox"/> Brakes | Turn Indicators | <input type="checkbox"/> Tires |
| <input type="checkbox"/> Carburetor | <input type="checkbox"/> Mirrors | <input type="checkbox"/> Transmission |
| <input type="checkbox"/> Clutch | <input type="checkbox"/> Muffler | <input type="checkbox"/> Wheels |
| <input type="checkbox"/> Defroster | <input type="checkbox"/> Oil Pressure | <input type="checkbox"/> Windows |
| <input type="checkbox"/> Drive Line | <input type="checkbox"/> On-Board Recorder | <input type="checkbox"/> Windshield Wipers |
| <input type="checkbox"/> Engine | <input type="checkbox"/> Radiator | <input type="checkbox"/> Other |
| <input type="checkbox"/> Fifth Wheel | <input type="checkbox"/> Rear End | |
| <input type="checkbox"/> Front Axle | <input type="checkbox"/> Reflectors | |
| <input type="checkbox"/> Fuel Tanks | <input type="checkbox"/> Safety Equipment | |
| <input type="checkbox"/> Heater | Fire Extinguisher | |
| | Flags – Flares – Fuses | |
| | Spare Bulbs & Fuses | |
| | Spare Seal Beam | |

TRAILER(S) NO (S). _____

- | | | |
|--|---------------------------------------|------------------------------------|
| <input type="checkbox"/> Brake Connections | <input type="checkbox"/> Hitch | <input type="checkbox"/> Tarpaulin |
| <input type="checkbox"/> Brakes | <input type="checkbox"/> Landing Gear | <input type="checkbox"/> Tires |
| <input type="checkbox"/> Coupling Chains | <input type="checkbox"/> Lights – All | <input type="checkbox"/> Wheels |
| <input type="checkbox"/> Coupling (King) Pin | <input type="checkbox"/> Roof | <input type="checkbox"/> Other |
| <input type="checkbox"/> Doors | <input type="checkbox"/> Springs | |

Remarks: _____

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Condition of the above vehicle is satisfactory

Driver's Signature _____ PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Above Defects Corrected

Above Defects Need NOT Be Corrected For Safe Operation Of Vehicle

Mechanic's Signature _____ Date _____

Driver's Signature _____ Date _____

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Dustin Carlton <dustin.carlton@getbellhops.com>

RE: [EXTERNAL] Fwd: LETTER

1 message

Stichter, Joshua <joshua.stichter@hubinternational.com>

Wed, Aug 21, 2019 at 5:44 PM

To: Dustin Carlton <dustin.carlton@getbellhops.com>

Here you go!

Another quick question that came up today – See attached #4. Hoping to respond to PA PUC today with an indication that this is not going to be a compliance issue for us. Can we get the Form E insurance filing for PA?

YES, we can do Form E filings.

Thank You,

Brandon K. Laam**New Business Underwriter****Mover's Choice,****a division of Specialty Program Group, LLC**

222 Gateway Rd. W Napa, CA 94558

Phone: 800-852-1968 x 138**Direct: 707-261-2738****Fax: 707-252-5905**

Doing business in California as SPG Insurance Solutions

License No. 0L09546

Thanks!

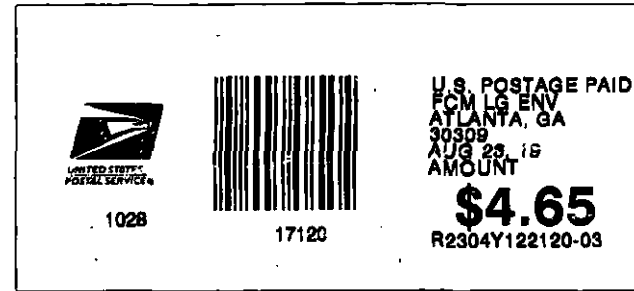


Josh Stichter, CIC

Vice President

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