

# Pennsylvania Moving & Storage Associates



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3041

December 16, 2013

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

Ref: Proposed Rulemaking regulation # 57-298 "Household Goods in Use & Property Carriers" [IRRC # 3041]

Dear Commissioners,

Discussions regarding the proposed rule making took place between representatives of PMSA and the PUC. Missing from this proposal is a key issue, which was suggested in regards to new applicants - "A PLACE of BUSINESS" within the commonwealth of Pennsylvania. Since the proposed regulation makes reference to some Federal and State mandates, lets review one - for ex: New Jersey, where a licensee must maintain a place of business within its boundaries and storage lots must not leave their borders.

We believe this is necessary in order to have a level playing field and afford "Consumer Protection", allow the state the opportunity to collect additional revenue, PUC inspectors access to the location & equipment for inspection, increase in the economic climate, for ex: employing Pennsylvania residents, paying taxes and supporting local business's and communities, to name a few.

PMSA will defer to the individual member to provide their input regarding state wide authority, as this directly affects the "VALUE" of their authority and business. If this proposed regulation is adopted, we suggest that all certificated HHG's carriers, presently in good standing, be grandfathered in.

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Another factor to consider is the role the rogue operator plays in this scenario and the effect on the general public. The PUC inspectors have been more than cooperative in this effort, but additional time has to be spent on curtailing the use of the internet and an increase in sting operations. With this in mind, even though it is not part of this proposal, fines should be increased to deter the criminals from abusing the consumer, taking business away from legal movers and depriving the State of Pennsylvania from additional revenue.

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

Sincerely yours,

J W McGrath  
PMSA  
Executive Director

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CC: Mr. Silvan B. Lutkewitte III, Chairman of the IRRC  
PMSA Board of Directors  
PMSA Membership  
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Interested Parties