

FILE

**COTTER**

July 18, 2008

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PUCO

The Public Utilities Commission of Ohio  
Docketing Division – 13<sup>th</sup> Floor  
180 East Broad Street  
Columbus, Ohio 43215

To the staff of the Commission,

In response to request for comments to Case No. 08-599-TR-ORD, unless noted below I am NOT opposed with the proposed rule review. Bold indicates addition or change.

Page 2 of the Entry – Paragraph 4

Commission should prescribe or give approval of all forms required by Carriers. See forms previously approved by the PUCO and are currently provided by the Ohio Association of Movers, Inc.

4901:2-19-02 – General Provisions

(B) Pursuant to its jurisdiction under Title 49 of the Revised Code and upon notice to all interested parties with time to comment, the commission may: .....

(F) The July 2, 2008 - date should be the same day the new rules are effective.

4901:2-19-03 – Tariffs and rates

(D) All carriers are liable for the **declared** value of goods .....

(E) OK if relates to INTERSTATE traffic ONLY.

(F) All tariffs shall include a title page **showing name of carrier, address and PUCO Certificate No.**, consistent with the .....

(M) ADD – **Tariffs to be posted on PUCO website by the effective date.** This needs to be accessible for a consumer verification of rates.

4901:2-19-04 – Changes to tariffs

(A) Change to: **Tariff changes will be effective 10 days from the date received by the PUCO.** The PUCO has active supervision of rate changes and needs time to post on their website for verification by the consumer.

(D) We need further explanation. Interstate carriers do not have hourly rates.

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(E) By using discounting and special contracts indicates discrimination to other consumers not meeting the criteria of the contract. Delete this item and see the recommended amended 4901:2-19-16 – Prohibitions.

4901:2-19-06 – Limitations of the liability of carriers and reimbursement for lost or damaged goods.

(E) Carrier's need the option to offer Depreciated Value.

(K) OK if relates to INTERSTATE traffic ONLY. (Should read paragraph (F) not (E).)

4901:2-19-07 – Determination of weights

(E) OK if relates to INTERSTATE traffic ONLY.

4901:2-19-08 – Estimates by the carrier

(G) Maintain the use of the "Moving in Ohio" brochure, prescribed by the PUCO.

(M) OK if relates to INTERSTATE traffic ONLY.

4901:2-19-09 – Receipt or Bill of Lading

(F) OK if relates to INTERSTATE traffic ONLY.

4901:2-19-15 – Claims for loss or damage

Items (B) and (C) need to be consistent with time frames. If changing (B) to thirty days change (C) to thirty or keep both at sixty.

4901:2-19-16 – Prohibitions

(B) Should read: **Commission shall establish customer complaint procedures that comply with all of the following requirements:.....**

(C) No "unreasonable" discounts???? Not sure how "unreasonable" is defined. We believe if the PUCO wants to allow for discounts such as Senior Citizen's or a coupon, then "unreasonable" discounts needs to be limited to a maximum percentage, i.e., 15%. Large carriers have the ability to give much larger discounts to lock in a move than a small agent would be able to offer, therefore putting them out of business very quickly.

Thank you and I look forward to your reply on July 28, 2008.

Sincerely,



William C. Bord, Secretary-Treasurer  
The Cotter Moving & Storage Company

PUCO #376 HG