



## Common Sense Initiative

**Mike DeWine**, Governor  
**Jon Husted**, Lt. Governor

**Sean McCullough**, Director

### MEMORANDUM

**TO:** Angela Hawkins, Public Utilities Commission of Ohio

**FROM:** Ethan Wittkorn, Business Advocate

**DATE:** December 31, 2021

**RE:** CSI Review- Transportation of Household Goods (OAC 4901:2-19-01, 4901:2-19-02; 4901:2-19-03; 4901:2-19-04; 4901:2-19-05; 4901:2-19-06; 4901:2-19-07; 4901:2-19-08; 4901:2-19-09; 4901:2-19-10; 4901:2-19-11; 4901:2-19-12; 4901:2-19-14; 4901:2-19-15; 4901:2-19-16; 4901:2-19-17)

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On behalf of Lt. Governor Jon Husted, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Commission as provided for in ORC 107.54.

### Analysis

This Public Utilities Commission of Ohio (Commission) rule package consists of three amended, and 13 no change rules. The rules were submitted to the CSI Office as part of a statutory five-year review on July 28, 2021, and the public comment period was open through September 15, 2021. Unless otherwise noted below, this recommendation reflects the version of the proposed rules filed with the CSI Office on July 28, 2021.

The proposed rules cover the Commission's requirements of motor carriers that transport household goods throughout the state. Amendments have been proposed to the rules to reduce record retention on tariff contracts from three years to twelve months, to allow for some records to be kept in electronic forms, and remove requirements that company numbers be listed on vehicles.

During the early stakeholder outreach period, the Commission held a workshop open to stakeholders and the wider public. Notice of the workshop was delivered to interested parties of

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the Commissions transportation division, as well as the Ohio Association of Movers, and the Ohio Brokers of Household Goods. No comments were submitted during either the workshop or the CSI public comment period.

Communities impacted by the rules may include for-hire carriers that move household goods interstate and intrastate. Impacted parties may incur administrative compliance costs such as records retention requirements, maintaining liability insurance coverage, billing requirements, and the time to complete and submit required forms. Additionally, carriers are required to establish rates, charges, and provisions in tariffs filed with the Commission. The Commission has stated that the adverse impacts are necessary to establish uniform requirements for the regulated carriers of household goods.

### **Recommendations**

Based on the information above, the CSI Office has no recommendations on this rule package.

### **Conclusion**

The CSI Office concludes that the Commission should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.