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Surface Transportation Board
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July 18, 2011

Attention: Cynthia T. Brown
Chief, Section of Administration

Reference: Docket No. RR999 (Amendment No. 5) Released Rates of Motor Carriers of Household Goods, Decided March 10, 2011.

My name is Joseph M. Harrison and I am a party of record in the above referenced proceeding.

The purpose of this communication is to first thank the Surface Transportation Board for extending the initial April 1, 2011 effective date of the referenced decision to November 1, 2011 and secondly to request that the Board give consideration to issuing a final decision in this matter no later than the end of August, 2011.

I am aware that it is the sole prerogative of the Board to issue a decision when it believes it is the appropriate time to do so. However, I am requesting consideration for an August decision to give interstate movers, especially smaller less sophisticated movers a better opportunity to comply with the Boards new requirements by the November 1, 2011 deadline.

When a final Board decision is issued it will take a fair amount of time just to ensure that the thousands of affected interstate mover's simply become aware of the new paperwork requirements and higher full replacement value levels (assume \$6.00 and \$6000.00). It will likely take less than a week for the movers' national trade associations to inform their members regarding the initial details of the decision and about the same time frame for the industry's van-lines to communicate initial details of the decision to its respective agents. However, there are a substantial number of movers who operate independently from national trade associations and/or van lines. These non-affiliated movers rely on consultants, a variety of vendors, local and state organizations and simply "word of mouth" to obtain this type of important regulatory information.

Based on a time frame of a Board decision rendered in August, 2011, it will be well into September before sufficient and accurate details of the decision reach smaller non-affiliated interstate movers. At that point in time, they will have barely over 60 days to accomplish time consuming compliance. As a result, it would be very helpful if a decision could be issued next month to give affected movers sufficient time to digest the decision and begin as soon as possible the process of compliance (education and paperwork tasks). An August decision will also surely enhance industry-wide compliance by the November 1, 2011 deadline. A decision issued in September or later will make industry compliance by

November 1 extremely difficult. From a consumer's prospective, the regulations won't be very helpful if compliance is somewhat lacking by the November 1 deadline.

Lastly, I would assume the industry's associations and van-lines would also appreciate an August Board decision because while they possess more efficient and professional communication and analysis mechanisms, they have the same daunting compliance tasks (education, paperwork changes) to accomplish in a very short time frame.

In conclusion, my only motivation for this communication is to ensure industry-wide compliance with the Board's new liability-related requirements for the benefit of its consumer customers.

Thank you for considering my request,

Joseph M. Harrison, President
Joe Harrison Consulting, Inc.

Cc: Parties of Record