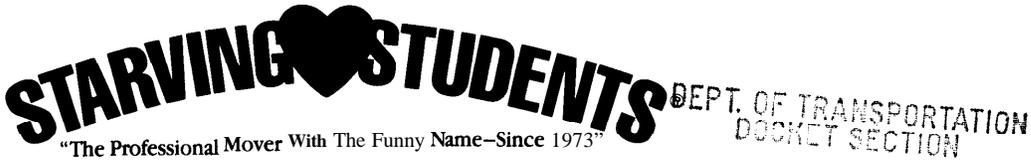


QA#37370



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13 July 1998

Docket Clerk
 U.S. DOT Dockets
 Room PL-40 1
 400 Seventh Street S.W.
 Washington DC 20580-000 1

Dear Sirs,

Re: Docket No: FHWA-97-2878 - 4

I am writing to express my deep concern regarding the FHWA's proposal to require movers to provide written estimates on all interstate shipments.

There are three reasons that I feel that there is a better alternative.

1. A written estimate requires a personal visit to the shippers' residence. This is very costly. While most shippers with large interstate moves obtain a written estimate prior to the move, when the cost of the move is under \$1,500, the price is kept affordable to the shipper by not performing a written estimate or visual inspection. To require a prior written estimate would add \$250 or more to the cost of the move. Adding such cost would discourage many shippers from hiring a mover for small moves and would require them to perform the move themselves. Therefore, such a requirement would be against the interest of the customer because it would take this low cost service alternative away from them.
2. In many cases there is simply not enough advance time to perform a visual inspection/written estimate. For many personal reasons (job change, illness, unexpected events, etc.) shippers often schedule moves with very short notice. The amount of notice often does not permit a prior visual inspection to be performed. In our case, we will perform approximately 50,000 moves next year, and the majority of them will be booked within seven days of the scheduled move.
3. Starving Students, as well as many other movers, perform numerous moves for shippers that relocate from origins where we do not have a local office in the vicinity. In such cases, a prior visual inspection would be impossible. Consequently, the consumer would be relegated to selecting a mover not

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based upon price or service, but upon the proximity of a field estimator. Starving Students and other small movers offer a low cost, no frills alternative to the large van lines. To exclude us from performing interstate moves because we do not maintain a national network of estimators like the major van lines do, is an unfair restraint of trade. Consumers should have more options, not fewer.

In summary, both shippers and carriers want the same thing, i.e., for the consumer to pay and the carrier to receive a reasonable price for the transportation of household goods across interstate lines. Since the bulk of the transportation charges are made up by a rate that considers the weight of the goods to be transported and the distance they are to be moved, the sensible alternative to the proposed solution is to require that binding rate quotes be provided to the consumer prior to the goods being accepted for shipment.

A written estimate does not change the weight or distance of the shipment. While the actual distance can be determined prior to the move, the actual weight of the goods to be transported can only be determined once a truck is loaded and weighed at a certified scale. The difference between the two proposals is that with rate quotes, rates are contractually agreed upon prior to the move though not the total cost of the move, and with estimates, the total cost is determined prior to the move regardless of the actual weight of the shipment. Each alternative has its place in our industry, and we should not limit our customers to just one methodology.

Thank you for your consideration.

Very Truly Yours,



Ethan Harold Margalith
Chief Executive Officer
Starving Students, Inc.

cc. Joe Harrison
Jane Downey
American Moving & Storage Association
1611 Duke Street
Alexandria, VA 223 14

EHM/CO/883