Attn: Nebraska Public Service Commission

Commissioners and NPSC Staff,

Thank you for your time and interest in the moving industry before and after the changes from LB461. I appreciate the thought and effort that has gone into these proposed rules and regulations and support these as a basic foundation to protect the consumer through basic standards. I would suggest the following changes to be considered:

1. Cargo Insurance (page 7 003.03A)
   a. A minimum of $35,000 to be required instead of the proposed $5,000 minimum.
      i. Reasoning: To be able to insure customers that desire to insure their belongings to a replacement value $5,000 is not an adequate amount. I am suggesting at least a minimum of $30,000. I come to this number because a medium/small moving truck holds 5,000 to 6,000lbs when full. Using the current industry standard of $6/lb for household goods replacement value for that comes up to around $35,000.

2. Required Weight tickets (page 47 13.09e2) and Required inventories (page 46 013.09c3)
   a. For moves that do not leave a metropolitan area or do not cross county lines a mover may disregard obtaining a weight ticket or completing an inventory.
      i. Reasoning: Most moves that stay within a short distance get loaded and unloaded on the same day making obtaining weight tickets impracticable and making an inventory unneeded.
   ii. Reasoning: Using city (or metropolitan) limits and county lines creates a clear and legal lines of reference instead of using an arbitrary distance.

3. Disclosure of limits of Liability (page 46 013.09c6)
   a. Disclosure of the limits of its liability and the valuation options available for any claims of damage to shipper’s household goods must be made in a clear, concise and transparent way.
   b. If a licensee does not make limitations to their liability clear and have written proof of such, I would support an effort to protect the customer and hold the licensee to a full value replacement level of liability to that customer.
      i. Reasoning: A consistent moving industry issue is customers not realizing that they must set a valuation to their items before the move starts and that the mover may not be insuring their items to a value that they anticipated. Due to this being such a consistent issue, nationally the FMCSA mandated a special “declaration of value” form and made it incumbent on the mover to show a consumer their options. If a mover can
not show that the shipper was given valuation options, the mover is held to the highest level of liability, which I support.

Thank you again for your consideration. If you have any questions or would like any elaboration please let me know and I would be happy to be of service.

Sincerely,
Lee Saltzgaber
Owner/General Manager
Attached are remarks regarding this proposal. I have attached a pdf and a word copy for whatever is easier for you.

Thank you

Lee Saltzgaber

Heartland moving