



**STATE OF ALABAMA**  
**PUBLIC SERVICE COMMISSION**  
**P.O. BOX 304260**  
**MONTGOMERY, ALABAMA 36130**

TWINKLE ANDRESS CAVANAUGH, PRESIDENT

JOHN A. GARNER, EXECUTIVE DIRECTOR

JEREMY H. ODEN, ASSOCIATE COMMISSIONER

CHRIS "CHIP" BEEKER, JR., ASSOCIATE COMMISSIONER

**PETITION OF MOVE & STORE, LLC  
FOR A WAIVER FROM THE  
VEHICLE IDENTIFICATION REQUIREMENT IN  
MOTOR CARRIER RULE 3.22**

**DOCKET 31733**  
**CERTIFICATE NO. C3989**

**ORDER**

**BY THE COMMISSION:**

On or about August 27, 2020, Move & Store, LLC<sup>1</sup> ("Move & Store"), a certificated common carrier of household goods, submitted a petition for a waiver from the external vehicle identification requirement in Motor Carrier Rule 3.22. Rule 3.22 states that "no common carrier shall display any business, trade or fictitious name in larger lettering or more prominently than the business name under which the certificate was issued." This requirement presented a problem for Move & Store because it had acquired two trade names from former household goods carriers as part of an asset purchase agreement and the Commission cannot issue a certificate under multiple trade names. The acquired trade names are "Admiral Movers" and "New Latitude Moving & Storage."<sup>2</sup> Because of the "brand awareness and customer loyalty" associated with these trade names, Move & Store desired to display the trade names on its vehicles in larger lettering than the business name under which the certificate was issued.

This requirement in Rule 3.22 protects consumers by promoting clear identification of the name of the carrier with authority to transport household goods. Transportation of household goods is a service that most customers use infrequently and involves the handling of valuable personal property. Because of the

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<sup>1</sup> Move & Store has changed its name twice since obtaining authority from the Commission. In 2011, it was granted a certificate as Move Auburn LLC. In 2013, the name was changed to Move LLC. In 2016, the name was changed to the current name, Move & Store, LLC.

<sup>2</sup> Move & Store has registered both trade names with the Alabama Secretary of State.

infrequent use and the value of the property, this type of transportation service is susceptible to fraud. This potential for fraud may be reduced if a household goods carrier is required to prominently display the name under which the certificate was issued.

Because of the concerns related to potential fraud and possible customer confusion over the name of the carrier, any approved waiver from this requirement must specify steps that the household goods carrier will take to ensure that its customers can clearly identify the name under which the certificate was issued. Such steps were included in Move & Store's 2020 petition. Move & Store stated that all its trucks would include door markings that clearly reference "Move & Store, LLC." For example, the trucks marked with the Admiral Movers trade name would have the following door marking: "Admiral Movers operated by Move & Store, LLC." Move & Store also indicated that its terms of service agreement would clearly state "Move & Store, LLC."

Considering the above-stated consumer protection concerns and Move & Store's steps to prevent customer confusion regarding the name of the carrier, on September 11, 2020, the Commission approved a temporary waiver of one year from the vehicle identification requirement in Rule 3.22. The one-year period allowed the Commission to evaluate whether the steps taken by Move & Store adequately protected customers. This temporary waiver was conditioned on Move & Store's suggested safeguards: the vehicle door markings and the reference to "Move & Store, LLC" on the terms of service agreement. Further, in addition to the terms of service agreement, the Order required that Move & Store clearly and prominently include "Move & Store, LLC" on all other documents presented to its customers.

On March 18, 2022, Move & Store petitioned to extend this temporary waiver for an additional two years. The petition indicated that the company had complied with the 2020 Commission Order and received no customer complaints regarding confusion about the name of the company providing service. On April 8, 2022, the Commission granted the requested waiver based on the same terms included in the 2020 Commission Order.

On April 29, 2024, Move & Store again petitioned to extend this temporary waiver for an additional two years. As before, this petition indicated that the company had complied with the 2020 Commission

Order (as well as the April 2022 extension) and received no customer complaints regarding confusion about the name of the company providing service. Notwithstanding the apparent lack of problems during the previous waiver period, Commission Staff recommended the grant of a shorter waiver in order to address a permanent resolution to this issue. Based on this recommendation, through an order issued on May 23, 2024, the Commission granted Move & Store a temporary waiver, of 120 days from the expiration of the previous waiver (April 8, 2024) from the requirement in Motor Carrier Rule 3.22 that “no common carrier shall display any business, trade or fictitious name in larger lettering or more prominently than the business name under which the certificate was issued.”

On June 18, 2024, Commission Staff met with a representative of Move & Store to discuss a more permanent resolution. At the meeting, the representative of Move & Store described how the company ensures customer awareness that Move & Store is the entity with authority from the Commission. The representative for Move & Store also agreed to update its websites to more clearly show that all its brands belong to Move & Store. Based on these safeguards and with the additional condition that the company meet with Staff annually regarding the employment of these safeguards, Commission Staff recommends approval of an additional temporary waiver.

**IT IS THEREFORE ORDERED** that Move & Store, LLC is granted a temporary waiver, of 2 years from the effective date of this order from the requirement in Motor Carrier Rule 3.22 that “no common carrier shall display any business, trade or fictitious name in larger lettering or more prominently than the business name under which the certificate was issued.”

**IT IS FURTHER ORDERED** that, during this temporary waiver period, Move & Store, LLC shall meet with Commission Staff annually about the safeguards in place to ensure customers can easily identify the name of the carrier with the authority to transport household goods.

**IT IS FURTHER ORDERED** that, as a condition of this temporary waiver, Move & Store, LLC shall prominently display “Move & Store, LLC” on the doors of its vehicles.

**IT IS FURTHER ORDERED** that, as a condition of this temporary waiver, Move & Store, LLC shall prominently display “Move & Store, LLC” on all documents presented to its customers.

**IT IS FURTHER ORDERED** that, to request a waiver beyond two years, Move & Store, LLC must submit an additional petition for a waiver that includes a summary of the effectiveness of the safeguards required by this order.

**IT IS FURTHER ORDERED** that jurisdiction in this cause is retained for whatever order or orders deemed appropriate by the Commission.

**DONE** at Montgomery, Alabama this <sup>8<sup>th</sup></sup> day of July 2024.

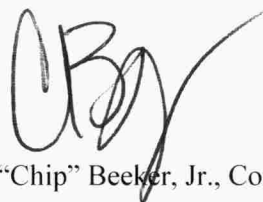
ALABAMA PUBLIC SERVICE COMMISSION



Twinkle Address Cavanaugh, President



Jeremy H. Oden, Commissioner



Chris "Chip" Becker, Jr., Commissioner

ATTEST: A True Copy



Walter L. Thomas, Jr., Secretary