

R. McAlister

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EXECUTIVE DIRECTOR

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Georgia Public Service Commission

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FILED

NOV 03 2008

EXECUTIVE SECRETARY
G.P.S.C.

November 3, 2008

Mr. Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington St.
Atlanta, GA 30334

Re: Transportation Docket No. 28097

Dear Mr. McAlister:

Please find *Staff's Proposed Final Order* for filing in the above-referenced Docket.

Respectfully Submitted,

Kelli Leaf, Staff Attorney
Georgia Public Service Commission
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EXECUTIVE SECRETARY
G.P.S.C.

IN THE MATTER OF:)
)
YAIR KNAFO, Individually and ADVANTAGE)
MOVING & STORAGE, INC., a Georgia Business)
Corporation, RESPONDENTS)

DOCKET NO. 28097

RECOMMENDED ORDER

APPEARANCES:

On behalf of the Georgia Public Service Commission Transportation Staff:

Kelli Leaf, Esq.

On behalf of Yair Knafo and Advantage Moving & Storage, Inc.:

Yair Knafo

This matter comes before the Georgia Public Service Commission ("Commission") on complaint of Staff and at least one individual whose household furnishings were moved illegally during an un-certificated move perfected by Yair Knafo, CEO for ATLANTIC RELOCATION, INC. ("Mr. Knafo") and/or his designees (collectively referred to herein as "Respondents" or "Applicants"). The issues for decision by the Commission are:

A) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc., willfully and wantonly neglected, refused to comply and/or failed to observe the laws of the State of Georgia and the Rules of the Georgia Public Service Commission (“GA PSC Rules”), including but not limited to:

- 1) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc. willfully and wantonly conducted the moves complained of in violation of Georgia Law and the Commission’s Transportation Rules requiring Commission certification prior to providing service? (O.C.G.A. 46-7-3).**
- 2) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc., willful and wanton violations under its previous corporate entity Advantage Moving & Storage, Inc. as well as those violations already committed by applicants under its new corporate identity, Atlantic Relocation, Inc., warrant denial of Applicants’ Application for Class “B” Household Goods Carrier Certification? (O.C.G.A. § 46-7-23).**

B) If proven, whether the willful and wanton actions of Yair Knafo and/or his designees, acting as agents for Mr. Knafo and/or Atlantic Relocation, Inc., as relates to the move(s) complained of herein, warrant assessment of penalties in accordance with the Commission’s authority to so act? (O.C.G.A. §§ 46-2-91, 46-7-3, 46-7-90; GA PSC Transportation Rule 515-16-3-.07, 515-16-14-.07)

I. JURISDICTION AND AUTHORITY

The Commission has jurisdiction over this matter pursuant to O.C.G.A. §§ 46-2-20 *et. seq.*, 46-2-50 *et. seq.*, 46-2-90 *et. seq.*, 46-7-1 *et. seq.*, 46-7-90 *et. seq.*, 46-9-40 *et. seq.* and 50-13-1 *et. seq.* The Commission further has jurisdiction over this matter pursuant to the Commission’s Transportation Rules including but not limited to: Rules 515-16-1-.03, 515-16-2-.07, 515-16-3-.07, 515-16-5-.01 through 515-16-5-.20, 515-16-6-.03, 515-16-10-.02, 515-16-10-.06, 515-16-10-.07, 515-16-15-.01 through 515-16-15-.12.

II. PROCEDURAL HISTORY

On April 30, 2008, the Commission's Transportation Staff ("Staff") received a complaint call from Mr. Jim Adams, complaining that he had made an interstate move performed by Atlantic Relocation, Inc., from Florida to Georgia. Mr. Adams stated that the corporate officers of Atlantic Relocation, Inc. were Yair Knafo and Phillip Brett Walker. Mr. Adams also stated that Atlantic Relocation, Inc., was located at 4300 Banker Circle, Suite D, Atlanta, Georgia. The two officers and the business address are the same principal operators for Advantage Moving and Storage, Inc. Mr. Adams was advised that the Commission has regulatory authority over *intrastate* moves, and was referred to the Federal Motor Carrier Safety Administration. (Transcript p. 22).

On May 1, 2008, Staff sent Cease and Desist Letters to Respondents advising that *no intrastate* moving operations could be conducted in Georgia until Respondents were legally certificated by the Commission. The letter instructed Respondents to refrain from making any *intrastate* moves and outlined penalties for failure to follow the Commission's instructions. The letters were sent by U.S. Mail, regular and certified/ return receipt requested. The letter sent by U.S. regular mail was not returned. The letter, sent by U.S. Mail certified/ return receipt requested, was refused. (Staff Exhibit 1).

On May 7, 2008, the Commission received a complaint from Sam Taylor regarding an interstate move performed by Atlantic Relocation. Mr. Taylor was advised that the Commission has regulatory authority over *intrastate* moves, and was referred to the Federal Motor Carrier Safety Administration. (Transcript p. 26-27).

On July 18, 2008, Atlantic Relocation, Inc. filed an Application for Class "B" Household Good Carrier Certification with the Commission seeking *intrastate* household goods carrier authority. Staff reviewed the Application and returned it to Atlantic Relocation, Inc, advising Atlantic Relocation, Inc. that the Application could not be processed due to multiple deficiencies. Staff found deficiencies with the declared Financial Statement, as the Application did not meet the minimum net worth requirement. The Commission requires a net worth of a minimum of \$50,000 be established. Atlantic Relocation, Inc., stated its net worth as \$24,500. (Transcript p. 31). Second, both corporate officers, Yair Knafo and Phillip Brett Walker, were principal operators of Advantage Moving and Storage, Inc., and the corporate address stated by Atlantic

Relocation, Inc, was the same address as previously certificated household good carrier Advantage Moving and Storage, Inc., which was under investigation and threat of revocation at that time.

On July 31, 2008, Staff received a voicemail message from Mr. Knafo requesting advice as to how he could resolve the Application deficiencies, etc. in order that the Atlantic Relocation Inc. Application for *intrastate* household goods carrier certification could be processed. In addition, Mr. Knafo stated on this voicemail that the reason he was starting Atlantic Relocation, Inc., was due to the high number of customer complaints received as Advantage Moving and Storage, Inc., which was basis for the decision to close Advantage Moving and Storage, Inc. and start Atlantic Relocation, Inc. (Transcript p. 34).

On August 13, 2008, Staff was notified of a complaint against Atlantic Relocation, Inc. from Ms. Page Watts. Ms. Watts complained that Atlantic Relocation, Inc, had performed an *intrastate* move for Ms. Watts and had overcharged her and refused to return her goods.

On August 21, 2008, Staff scheduled the matter for hearing. A Notice of Hearing was issued by the Commission on August 21, 2008. (Staff Exhibit 6).

On August 25, 2008, Staff sent a Notice of Hearing to Atlantic Relocation, Inc., via U.S. Mail, both regular post and certified/ return receipt requested to Yair Knafo and Phillip Brett Walker, individually, at the offices of Atlantic Relocation, Inc. Staff received copies of both signed return receipt cards showing that both certified letters were signed and received. (Transcript pp. 34-35).

On September 4, 2008, Staff audited the books and records of Atlantic Relocation, Inc. Sixty-one (61) un-certificated *intrastate* bills of lading were obtained. All sixty-one (61) un-certificated *intrastate* bills of lading were executed under the name of Atlantic Relocation, Inc., a non-certificated entity in the State of Georgia. Despite the lack of such required Commission Certification, all sixty-one (61) un-certificated *intrastate* bills of lading and associated addendums stated that the forms were prescribed by the Georgia Public Service Commission. All sixty-one (61) un-certificated *intrastate* moves were made illegally, from points beginning and ending *within* the state of Georgia, without the required certification from the Commission. (Staff Exhibit 7).

Also during the September 4, 2008 Audit conducted by Staff, Mr. Knafo again stated to Staff, that his rationale for changing to a new corporate name was due to a high number of customer complaints under the former Advantage Moving and Storage, Inc. name.

III. EVIDENCE PRESENTED AND LEGAL ARGUMENTS

O.C.G.A. § 46-7-2 provides that “the Commission is vested with the power to regulate the business of any person engaged in the transportation as a common or contract carrier of persons or property, either or both, for hire by motor vehicle on any public highways.” O.C.G.A. § 46-7-3 provides that the no household goods carrier shall “operate without first obtaining from the Commission a certificate.” Combined, these provisions, *inter alia*, supply the basis for the Commission’s jurisdiction over the household goods carrier services provided by Respondents. In addition, the Commission has the authority to investigate complaints of wrong doing. (O.C.G.A. § 46-7-27 provides that the Commission “is authorized to adopt such rules and orders as...may be deem[ed] necessary in the enforcement of this Chapter...Such rules and Orders shall have the same dignity and standing as if such rules and orders were specifically provided in this Chapter”). Moreover, O.C.G.A. § 46-7-7 provides that “the commission shall issue a certificate to a person authorizing transportation as a motor common or contract carrier of passengers or household goods subject to the jurisdiction of the commission if it finds that the person is fit, willing, and able to provide the transportation to be authorized by the certificate and to comply with regulations of the commission.” Thus, it is clearly within the Commission’s jurisdictional authority to authorize or deny a regulated entity’s Class “B” Household Goods Carrier Certificate Application for certification where the Commission finds such denial is substantiated by the record evidence.

The Commission will therefore consider the legal basis for and the evidence entered into the record at the Hearing on the Merits regarding each of the issues presented by the parties as follows:

A) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc., willfully and wantonly neglected, refused to comply and/or failed to observe the laws of the State of Georgia and the Rules of the Georgia Public Service Commission (“GA PSC Rules”), including but not limited to:

1) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc. willfully and wantonly conducted the moves complained of in violation of Georgia Law and the Commission’s Transportation Rules requiring Commission certification prior to providing service? (O.C.G.A. 46-7-3).

O.C.G.A. § 46-7-2 provides that “the Commission is vested with the power to regulate the business of any person engaged in the transportation as a common or contract carrier of persons or property, either or both, for hire by motor vehicle on any public highways.” Moreover, O.C.G.A. § 46-7-7 provides, “the commission shall issue a certificate to a person authorizing transportation as a motor common or contract carrier of passengers or household goods subject to the jurisdiction of the commission if it finds that the person is fit, willing, and able to provide the transportation to be authorized by the certificate and to comply with regulations of the commission.” Thus, it is clearly within the Commission’s jurisdictional authority to authorize or deny a regulated entity’s Class “B” Household Goods Carrier Certificate application for certification where the Commission finds such application is substantiated by the record evidence.

Staff submits that Mr. Knafo and/or his designees did in fact, willfully and wantonly conduct no less than sixty-one (61) un-certificated *intrastate* moves complained of in violation of Georgia Law and the Commission’s Rules. (Staff Exhibit 7).

As the evidence reflects, on September 4, 2008, Staff audited the books and records of Atlantic Relocation, Inc. (Transcript at p. 38). Sixty-one (61) un-certificated *intrastate* bills of lading were obtained. (Transcript at p.39). All sixty-one (61) un-certificated *intrastate* bills of lading were executed under the name of Atlantic Relocation, Inc., an entity that is not now nor has it ever been, certificated by the Georgia Public Service Commission to provide *intrastate* household goods carrier services. (Transcript at p.39). All sixty-one (61) un-certificated *intrastate* bills of lading and associated

addendums stated that the forms were prescribed by the Georgia Public Service Commission. (Transcript at p.39). All sixty-one (61) *intrastate* moves by Respondents were made illegally, from points beginning and ending within the State of Georgia, without the required certification from the Commission. (Transcript at p.39). Mr. Knafo did not deny having performed these moves without a certificate.

Based on the above, Staff submits that Respondents, Mr. Knafo, and/or his designees, acting on behalf of Atlantic Relocation, Inc., did willfully and wantonly conduct sixty-one (61) un-certificated *intrastate* moves without the required Class "B" Household Goods Carrier Certification required by Georgia Law and the Commission's Rules.

2) Whether Mr. Knafo and/or his designees, acting as agents for Yair Knafo and/or Atlantic Relocation, Inc., willful and wanton violations under its previous corporate entity Advantage Moving & Storage, Inc. as well as those violations already committed by applicants under its new corporate identity, Atlantic Relocation, Inc., warrant denial of Applicants' Application for Class "B" Household Goods Carrier Certification? (O.C.G.A. § 46-7-23).

According to O.C.G.A § 46-7-7, Applicants requesting intrastate household goods carrier certification must be "fit, willing, and able to provide the transportation authorized by the certificate and to comply with regulations of the commission." Fitness is comprised of three factors. The first is "the applicant's financial ability to perform the service it seeks to provide." (O.C.G.A § 46-7-7 (1)) The Application submitted for certification on behalf Atlantic Relocation, Inc., had a declared net worth of \$24,500. (Transcript p. 31). The Commission requires a net worth of \$50,000. (See the Commission's Application for Class "B" Interim Certificate to Operate as a Household Goods Carrier within the State of Georgia: <http://www.psc.state.ga.us/transportation/pdf/TR0006.pdf>). By Applicant's own documentation, Atlantic Relocation, Inc. does not meet the minimum financial threshold required by the Commission for the certification of Class "B" Household Goods Carriers.

The second aspect of fitness pursuant to O.C.G.A § 46-7-7(2), is that the Applicant must be capable and willing to "perform properly and safely the proposed service." By Mr. Knafo's own admission, Atlantic Relocation, Inc. received so many

customer complaints under his prior corporate name, Advantage Moving and Storage, Inc., that a name change was deemed warranted by Mr. Knafo, resulting in the newly incorporated, yet wholly un-certificated, Atlantic Relocation, Inc. (Transcript p. 34). However, Mr. Knafo has presented absolutely no evidence to show that corrective measures have or will be taken. Accordingly, Staff submits that the Applicant's recent name change was done solely to avoid corporate and/or personal responsibility and/or liability from the many complainants of the prior Advantage Moving and Storage, Inc. Thus, Staff submits that Atlantic Relocation, Inc. is simply the same wolf under cover of new clothing and is therefore, not only unwilling to properly and safely perform the household goods carrier services applied for, but wholly unfit.

According to O.C.G.A. § 46-7-7(3), the third aspect of fitness is "the applicant's willingness to comply with the laws of Georgia and the rules and regulations of the commission." As stated *infra.*, Staff audited the books and records of Atlantic Relocation, Inc. and obtained no less than sixty-one (61) un-certificated *intrastate* bills of lading. All sixty-one (61) un-certificated *intrastate* bills of lading were executed under the name of Atlantic Relocation, Inc. All sixty-one (61) un-certificated *intrastate* bills of lading and associated addendums stated that the forms were prescribed by the Georgia Public Service Commission. All sixty-one (61) un-certificated *intrastate* moves were made from points beginning and ending *within* the state of Georgia, without the required certification having ever been granted by the Commission. (Staff Exhibit 7). Staff therefore submits that Respondents' own actions wholly negate their willingness and even ability to comply with the laws of the State of Georgia and/or the Rules of the Commission. Based on the foregoing, Staff submits that Applicant's request for Commission certification as a Class "B" Household Good Carrier in the name of Atlantic Relocation, Inc. and/or under any other name should be DENIED.

B) If proven, whether the willful and wanton actions of Yair Knafo and/or his designees, acting as agents for Mr. Knafo and/or Atlantic Relocation, Inc., as relates to the move complained of herein, warrant assessment of penalties, fines in accordance with the Commission's authority to so act? (O.C.G.A. §§ 46-2-91, 46-7-3, 46-7-90; GA PSC Transportation Rule 515-16-3-.07, 515-16-14-.07).

It is undisputed in the record evidence in this case that the *intrastate* household goods carrier services provided by Respondents were carried out without the Commission issued certification required by Georgia Law and Commission Rule. As discussed *supra*, on September 4, 2008, Staff audited the books and records of Atlantic Relocation, Inc. and obtained no less than Sixty-one (61) un-certificated *intrastate* bills of lading. All sixty-one (61) un-certificated *intrastate* bills of lading were executed under the name of Atlantic Relocation, Inc. All sixty-one (61) un-certificated *intrastate* bills of lading and associated addendums stated that the forms were prescribed by the Georgia Public Service Commission. All sixty-one (61) un-certificated *intrastate* moves were made illegally, from points beginning and ending *within* the state of Georgia, without the required certification from the Commission. (Staff Exhibit 7).

Based on the foregoing, Staff submits that Yair Knafo, CEO of Atlantic Relocation, Inc. and/or his designees have willfully and wantonly violated the laws of the State of Georgia and the Rules of the Georgia Public Service Commission. Staff further submits that Respondents have willfully and wantonly disregarded Georgia Law and the Commission's Rules requiring certification as prerequisite to the provision of intrastate household goods carrier services within the State of Georgia. Staff further submits that in having provided these un-certificated moves, Respondents have deliberately misled the public by hiding behind the newly created and un-certificated corporate entity, Atlantic Relocation, Inc. Given the above, Staff recommends DENIAL of Respondents' Application for Class "B" Household Goods Carrier Certification and the assessment of a civil penalty against Respondents in the amount of three hundred five thousand dollars (\$305,000), to be payable to the Commission in certified funds, within thirty (30) days from the date of this order. Staff asserts that such penalties are proper given Respondents' continued disregard for Georgia Law and this Commission's jurisdiction and equate to the maximum of \$5,000.00 per illegal move (\$5,000.00/move x sixty one (61) moves) under O.C.G.A. § 46-7-91.

V. FINDINGS OF FACT AND CONCLUSIONS OF LAW

THE COMMISSION FINDS that it has jurisdiction over this matter pursuant to O.C.G.A. §§ 46-2-20 *et. seq.*, 46-2-50 *et. seq.*, 46-2-90 *et. seq.*, 46-7-1 *et. seq.*, 46-7-90 *et. seq.*, 46-9-40 *et. seq.* and 50-13-1 *et. seq.* The Commission further has jurisdiction

over this matter pursuant to the Commission's Transportation Rules including but not limited to: Rules 515-16-1-.03, 515-16-2-.07, 515-16-3-.07, 515-16-5-.01 through 515-16-5-.20, 515-16-6-.03, 515-16-10-.02, 515-16-10-.06, 515-16-10-.07, 515-16-15-.01 through 515-16-15-.12.

THE COMMISSION FURTHER FINDS that Respondents, Atlantic Relocation, Inc. are a Georgia business corporation with principal offices at 4300 Bankers Circle, Suite D Atlanta, GA 30360; and are engaged in the business of providing un-certificated household goods services as a motor common carrier in intrastate commerce within Georgia.

THE COMMISSION FURTHER FINDS that Respondent, YAIR KNAFO, is an individual Georgia citizen who is the CEO of Atlantic Relocation, Inc. and is therefore, responsible for managing such regulated carrier in compliance with Commission rules and orders and in a manner consistent with the statutes and rules administered by the Commission under O.C.G.A. §§ 46-2-91, 46-2-92, 46-2-93, and 46-7-39.

THE COMMISSION FURTHER FINDS that the evidence presented and entered into the record as a whole shows clear violations of the Georgia Code and this Commission's Transportation Rules.

THE COMMISSION FURTHER FINDS that Respondents have recently created Atlantic Relocation, Inc., a household goods carrier corporate entity, without gaining the requisite certificate from the Commission (which violates Georgia Law and the Commission's Rules) and appear to have done so deliberately, in order to mislead the public and shirk their corporate responsibilities for the previously Commission certificated entity, Advantage Moving and Storage, Inc. (Revocation of Advantage's Commission issued Certificate occurred on September 9, 2008).

THE COMMISSION FURTHER FINDS that based on all of the foregoing, DENIAL of the foregoing request for Class "B" Household Goods Carrier certification to Atlantic Relocation, Inc. is proper and that such certificate is hereby DENIED.

THE COMMISSION FURTHER FINDS that based on such DENIAL of the foregoing request for Class "B" Household Goods Carrier certification, Respondents shall cease and desist any further *intrastate* operations within the State of Georgia.

THE COMMISSION FURTHER FINDS that a civil penalty in the amount of three hundred five thousand dollars (\$305,000) be imposed against the Respondents to be payable to the Commission in certified funds within thirty (30) days from the date of this order. Such penalties are proper given Respondents' continued disregard for Georgia Law and this Commission's jurisdiction and equate to the maximum of \$5,000.00 per illegal move (\$5,000.00/move x sixty one (61) moves) under O.C.G.A. § 46-7-91.

THE COMMISSION FURTHER FINDS that Respondents shall cease and desist any and all *intrastate* activity within the State of Georgia under the name "Atlantic Relocation, Inc." since that corporate entity has been DENIED by this Commission, the certificate required by O.C.G.A. § 46-7-3.

THE COMMISSION FURTHER FINDS that Respondents shall cease and desist any and all other un-certificated *intrastate* household goods carrier activities in the State of Georgia, until such time as the Commission has lawfully issued Respondents collectively or individually, a valid Class "B" Household Goods Carrier Certificate.

THE COMMISSION FURTHER FINDS that any violations of this Commission's Order requiring Respondents to cease and desist all *intrastate* household goods carrier services in the State of Georgia shall result in the imposition of the maximum penalties provided for by Georgia Law (including but not limited to, O.C.G.A. §§ 46-2-91, 46-7-90 and 46-7-91) and may result in the Commission's request for a Civil Injunction against Respondents (collectively and/or individually) from a Georgia court of competent jurisdiction (O.C.G.A. § 46-7-31).

VI. ORDERING PARAGRAPHS

WHEREFORE IT IS ORDERED that all findings of fact and conclusions of law contained within the preceding sections of this Order are hereby adopted as the findings and conclusions of this Commission.

ORDERED FURTHER, that a motion for reconsideration, rehearing or oral argument or any other motion shall not stay the effective date of this Order unless otherwise ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this matter is expressly retained for the purpose of entering such further Order or Orders as this Commission may deem just and proper.

SO RECOMMENDED, this ___ day of November 2008:

Philip Smith, Hearing Officer
Georgia Public Service Commission
244 Washington St.
Atlanta, GA 30334
psmith@psc.state.ga.us

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN THE MATTER OF:)

)
Application for Household Goods Carrier Certification)
of Yair Knafo, Individually and ATLANTIC)
RELOCATION, INC., a Georgia Business)
Corporation, APPLICANTS/RESPONDENTS)

DOCKET NO. 28097

CERTIFICATE OF SERVICE

I hereby certify that *Staff's Proposed Final Order* in Docket No. 28097 was filed with the Commission's Executive Secretary and a copy of same was served upon all parties and persons listed below via hand delivery as indicated by an asterisk, or by depositing same in the United States mail.

*Mr. Phil Smith, Hearing Officer
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

Mr. Yair Knafo, CEO
Atlantic Relocation, Inc.
4300 Bankers Circle – Suite D
Atlanta, GA 30360

*Robert West, Director
Transportation Division
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334

Mr. Brett Walker, Vice President
Atlantic Relocation, Inc.
4300 Bankers Circle – Suite D
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Respectfully Submitted this 3rd day of November 2008:


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