

The North Carolina Movers Association realizes that electronic bills of lading will be a part of the future of moving within North Carolina and has no issues with the Commission approving the use of electronic bills of lading. We have consulted with cyber security experts and software developers in writing these comments.

Our comments on the issues are:

- 1) We feel the MRT needs to be amended so that the carriers that are authorized to use electronic bills of lading be listed on Page 9A of the tariff – similar to the way that those carriers who are authorized to use the electronic mileage guide are listed in the tariff. We feel that Commission needs to be aware of those carriers who are using electronic bills of lading. We feel that the electronic bill of lading only be an alternative to the paper bill of lading.
- 2) Bills of lading are only mentioned in passing in the Moving 101 brochure now. We feel that in the Delivery Day Section, we do need to add that your mover may use electronic bills of lading. If your mover uses an electronic bill of lading, make sure that you receive an e-mailed version of the final bill of lading. If you notice any discrepancy between the bill of lading e-mailed to you and the actual charges, contact the mover.
- 3) Since not all shippers have a level of computer savvy and the basic equipment of technology to access electronic BOLS, that shippers must be given the option to opt out of an electronic BOL. Shippers would have to have a computer and a valid e-mail address and not all do. We feel that shippers cannot be forced to use electronic BOLs.
- 4) The electronic BOL should have basically the same appearance as the current paper BOLs. We recognize that the electronic BOLS may require some spacing modification to allow it to fit properly on a tablet or computer. For this reason, we feel that all electronic BOLS need to be submitted for approval to make sure they are in compliance with the Commission's requirements as stated in the MRT. After they are reviewed by the Commission (or the Public Staff if the Commission rules), the carrier can be listed on Page 9A of the tariff. The paper version has listed on the right hand side different charges that may apply to the move. We see no need for the electronic BOLS to list charges that do not apply to the move. This will make the electronic version less cluttered and the shipper will be able to easily see what charges are listed. All the information on the left hand side of the BOL and the contract terms and condition should be a part of the electronic version. Signatures would need to be collected at both origin and destination.
- 5) The required electronic devices should be a tablet or laptop computer. A mobile phone should not be allowed to be an approved device. The size of phone would make the bill of lading hard to read.
- 6) Movers should be able to access their electronic BOLs and display them to the Highway Patrol. The Mover Association feels that the Highway Patrol should establish if they can handle this.
- 7) Our bills of lading currently do not request any Personal Identifiable Information that would leave our customers vulnerable. The electronic BOL should be requesting the same information. State law requires that the parties must consent to the use of electronic means for their electronic signature to be valid. Movers would have to add this statement to an electronic bill

of lading. We feel the Commission needs to establish the storage guidelines for data to make sure that all information is secure and safe.

- 8) Carriers are currently required to keep their bills of lading on file for seven years. Electronic versions should be maintained the same amount. Carriers should use a secure electronic system that is password protected for electronic records.