

APR 14 1989

Decision 89-04-049 April 12, 1989

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of)
 Viking Freight System, Inc. for)
 permanent authority to depart from)
 those provisions of General Order)
 155, 148, and 139 that would other-)
 wise prohibit the electronic)
 transmission of Bills of Lading and)
 freightbills and the electronic)
 receipt of freightbill payment.)

ORIGINAL

Application 89-02-006
(Filed February 3, 1989)

INTERIM OPINION

By this application, Viking Freight System, Inc. (Viking) requests permanent authority to depart from those provisions of General Orders (GO) 139, 148, and 155 that would otherwise prohibit the electronic transmission of bills of lading and freight bills and the electronic receipt of freight bill payments.

In support of this request, Viking alleges generally as follows:

The GO departures requested by Viking would allow it to establish a "paperless" bill of lading and freight bill process. Before marketing this service Viking began a series of communications, both written and oral, in March 1988 with the Commission's Transportation Division to clarify any legal roadblocks which would deny Viking the ability to adopt this procedure. These communications led the carrier to present the prepared testimony of Ed Hulton on behalf of Viking and the California Coalition For Trucking Deregulation in the ongoing investigation of the transportation of general freight (I.88-08-046).

This testimony, included with the application as Addendum A, includes a general description of EDI (electronic data interchange), a description of Viking's EDI capabilities, how

Viking has been disadvantaged by the Commission's regulatory restrictions, copies of correspondence between Viking and the Transportation Division concerning EDI, and Viking's request for the Commission to include the electronic transmission of bills of lading, freight bills, and self-invoices in the regulatory program implemented pursuant to a decision in I.88-08-046.

Viking states that while the Commission will consider the EDI services requested here on an industrywide basis in I.88-08-046, it is submitting this application to allow the Commission the option of considering "paperless" bill of lading and billing transactions on a more limited scope should industrywide application be denied or delayed. The carrier maintains there is an urgent, immediate need for the ability to engage in the electronic transmission of bills of lading and freight bills. It professes that there are a number of California intrastate shippers who are interested in immediately implementing the benefits associated with these services. These shippers include Bristol Myers Products Division, Clairol, Drackett, Westwood Pharmaceuticals, and Bristol Myers-USPNG.

Viking notes that the electronic transmission of loss or damage claims, freight bills, and bills of lading is authorized by the Interstate Commerce Commission (ICC). The carrier points out that on September 27, 1983 the ICC reconsidered that portion of its decision set forth in Ex Parte No. 263 and Ex Parte No. 406 regarding the electronic transmission of bills of lading. After reconsideration, the ICC decided to allow the electronic transmission of bills of lading. (Federal Carriers Cases, 37,066)

Since 1983 interstate carriers and shippers have taken advantage of these opportunities. For example, Yellow Freight System, Inc. generated 1.3 million "paperless" bills in 1988. Viking has a number of interstate EDI shipper participants who are interested in expanding EDI services to include California intrastate "paperless" billing.

In a letter to Viking dated September 21, 1988, Transportation Division, while enthusiastically supporting Viking's EDI procedure, raised several problem areas which had to be resolved before total conversion to EDI could be undertaken. These areas include:

1. Annotation of the released value provision, normally done on the bill of lading.
2. Obtaining a Section 7 "without recourse" signature, historically evidenced on the bill of lading.
3. Annotation of "Shipper's Weight, Load and Count" which appears on the bill of lading.
4. Transfer of exceptions, noted at time of pickup, from the manifest to the delivery receipt.
5. Issuance of accessorial service documents, as described in Rule 5.2 of GO 155.

The letter urged that Viking furnish a draft of a proposed application describing the carrier's EDI procedure. The letter also suggested that Viking seek authority to amend its tariff rules covering the collection of charges, issuance of documents, and any other provisions involved in the proposed conversion to EDI. Viking emphasizes that its Bill of Lading Manifest, shown in Addendum C, provides for released value provisions and Section 7 "without recourse" signature. Also, the exceptions area of the Bill of Lading Manifest provides for "Shippers weight, load and count" annotation, and for transfer exceptions noted at the time of pickup.

Viking has reviewed pertinent sections of the California Uniform Commercial Code, Division 7. To the best of the carrier's knowledge, it is aware of no provision that would deny the electronic transmission of bills of lading or minimize the contractual obligations associated with a bill of lading contract should that contract be transmitted electronically.

Viking describes the self-invoicing feature of EDI with the following step-by-step example:

1. Shipper receives purchase orders for merchandise from customers.
2. These orders are entered into shipper's computer systems.
3. Shipper's computers review existing inventories to verify availability of the merchandise.
4. If the merchandise is available the shipper's computer generates a bill of lading which is electronically transmitted to the motor carrier prior to pickup; or, shipper may computer-generate a Bill of Lading Manifest with electronic bills of lading to follow.
5. Carrier takes receipt of the Bill of Lading Manifest from shipper; or, if bills of lading were transmitted by shipper, carrier computer-generates the Bill of Lading Manifest.
6. Carrier's computer electronically transmits the Bill of Lading Manifest to the truck terminal designated to perform the pickup.
7. The manifest is printed at the truck terminal designated to perform the pickup.
8. Pickup driver takes the Bill of Lading Manifest to the shipping point to confirm freight quantity and conditions, and physically perform the pickup.
9. Driver returns the manifest with the freight to the pickup (origin) terminal.
10. The manifest number is entered into carrier's computer system, and the retrieved manifest is updated to include any driver exceptions noted on the pickup Bill of Lading Manifest.
11. Carrier's computer then generates shipment control data necessary to facilitate

delivery of shipment. The computer also rates the shipment and creates a freight bill image and a delivery receipt image.

12. The delivery receipt is electronically communicated to the carrier's destination terminal designated to physically perform the delivery or deliveries.
13. Shipper, who has the same computer rating program as carrier, can computer-rate the bills when it generates its bills of lading and electronically remit freight payment immediately without the need to be invoiced by carrier; hence, the term "self-invoicing."
14. The use of identical computer rating systems by carrier and shipper enables virtually error-free freight bill rating. However, freight bills can be retrieved by shipper or carrier to perform audits if they so choose.

Viking asserts that the benefits of EDI billing are (1) increased record accuracy, (2) reduced data entry costs, (3) reduced mailing costs, (4) less paperwork, and (5) better cash management for both shippers and carrier. The shipper also benefits from inventory reduction opportunities and reduced order time through electronic transmission of orders from its customers. Viking also states that labor costs associated with freight bill processing, freight bill remittance, and freight bill auditing are substantially reduced for the shipper. Furthermore, labor costs associated with posting freight bill payments and re-entering bill of lading information are substantially reduced for the carrier. Postage expense for hard copy freight bill processing is also eliminated for both shipper and carrier.

Viking proposes that the EDI services requested and required departures from GOs be published in the carrier's Rules Tariff 103-A. These rules are set forth in Addendum D to the

application. They will apply when a shipper's EDI capabilities are compatible with that of carrier, provided that both carrier and shipper agree to the electronic transmission of bills of lading and/or freight bills and/or freight bill payment. The rules cover the following subjects:

1. Disposition of loss or damage claims.
2. Disposition of overcharge or duplicate payment claims.
3. Bill of Lading Manifest description and process.
4. Accessorial services.
5. Extension of credit.
6. Issuance of freight bills.
7. Retention and retrieval of records.
8. Rating, billing, and delivery receipt process.
9. Freight bill payment process.

Discussion

It is evident that Viking has endeavored to comply with current Commission requirements governing the preparation of its application, and has conducted extensive research in the area of EDI as it relates to California intrastate motor carrier regulations. The carrier has had discussions and written communications with Transportation Division personnel over the past year to facilitate Commission approval of the EDI services described. It is the intention of Viking to offer EDI services to the shipping public as an option, and not as a mandatory procedure. Viking requests ex parte action in granting the relief sought.

In the regulation of transportation, adequate documentation is one of the cornerstones for effective enforcement of our adopted regulatory programs. GOs 139 and 148 set forth,

respectively, rules applicable in connection with the filing and processing of loss and damage claims, and overcharge or duplicate payment claims. GO 155 sets forth rules governing the issuance of documents and collection of charges by highway carriers. These GOs contemplate the issuance of "written" documents, although they do not state that the required "writing" must necessarily be on paper, or, to use the modern terminology, "hard copy." Such hard copy records have, of course, been the paper documents issued and retained by carriers and shippers for many decades.

The principal factor we are concerned with in this request is the retrievability of records necessary to verify the circumstances surrounding the transportation of a shipment. We are assured by Viking that all electronic shipping instructions and other shipment information are immediately available in hard copy. Furthermore, Viking's proposed rules include the use of a hard copy Bill of Lading Manifest (Addendum C to the application) which requires the signature of the shipper prior to or at time of initial pickup by the carrier. This feature of Viking's proposal will guarantee that separate components of split delivery, split pickup, or multiple lot shipments will be identified by shipper, in writing, before shipments are transported, and guard against the consolidation of shipment components by the carrier. In these circumstances, we believe the application may be granted for an initial period of one year.

Notice of filing of Viking's request appeared in the Commission's Daily Transportation Calendar. No objection has been received to granting the application. Transportation Division urges that the authority granted terminate at the end of one year. We understand the Transportation Division will have a special interest in monitoring this interim authority and evaluating the results of that monitoring. The authority sought involves a radical departure from procedures of long standing. We will grant the request for one year, unless sooner terminated or modified, and

invite Viking to refile for permanent authority in sufficient time to permit the continued, uninterrupted electronic billing activity authorized, assuming the carrier wishes to do so. During this interim period, Transportation Division will have adequate opportunity to monitor the activity, and report to the Commission the results of its monitoring with suggestions for terminating, modifying or extending the authority. Viking has agreed to comply with several conditions in connection with the granting of this authority. These are set forth in Appendix B, and will assist the Transportation Division in monitoring and auditing performance under this new electronic billing procedure.

Findings of Fact

1. GOs 139 and 148 require the production of written documents in connection with the filing of loss and damage claims, and overcharge/duplicate payment claims. GO 155 requires the issuance and retention of written shipping documents for each shipment transported.
2. Viking requests authority to implement its EDI system, involving the electronic billing of shipments, on a permissive basis, in connection with the transportation of intrastate shipments governed by GOs 139, 148, and 155. This authority contemplates the regular elimination of paper, or "hard copy" bills of lading, freight bills, etc.
3. In connection with its request, Viking desires to publish in its common carrier tariff the rules set forth in Addendum D to its application governing the electronic transmission of bills of lading, freight bills, and freight bill payment, as well as rules pertaining to the disposition of loss or damage freight claims, and overcharge or duplicate payment claims.
4. The electronic billings of shipments as described in this decision will be immediately retrievable in hard copy format, and will provide adequate opportunity for monitoring by Transportation

Division. Viking has agreed to the conditions contained in Appendix B in connection with this authority.

Conclusions of Law

1. The application should be granted for a period of one year unless sooner modified, terminated, or extended.
2. Transportation Division should be directed to monitor the activity granted by this decision, and report to the Commission not less than 60 days prior to expiration of this authority on whether it believes the authority should be modified, terminated, or extended.
3. Since there appears to be an immediate opportunity for Viking and shippers to achieve efficiencies and savings, and the application has not been protested, the effective date of this decision should be today.

INTERIM ORDER

IT IS ORDERED that:

1. Viking Freight System, Inc. (Viking) is authorized to publish, on 5 days' notice, the rules set forth in Appendix A to this decision.
2. The authority granted by this decision shall expire one year after today, unless sooner terminated, modified, or extended by the Commission.
3. The Commission's Transportation Division shall monitor the activity authorized by this decision, and shall report to the Commission the results of its monitoring with a recommendation on whether the authority should be modified, terminated, or extended. This report shall be presented to the Commission not less than 60 days prior to the expiration of the authority granted herein.

4. The authority granted herein is subject to compliance by Viking with the conditions set forth in Appendix B.

This order is effective today.

Dated APR 12 1989, at San Francisco, California.

G. MITCHELL WILK
President
STANLEY W. HULETT
JOHN B. OHANIAN
Commissioners

Commissioner Frederick R. Duda
being necessarily absent, did
not participate.

Commissioner Patricia M. Eckert
present but not participating.

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY.



Victor Weisser, Executive Director

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APPENDIX A
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Rules Governing the Electronic Transmission of
Bills of Lading, Freight Bills, and Freight Bill Payment

Where a shipper's Electronic Data Interchange (EDI) capabilities are compatible with that of the carrier's EDI services, and both shipper and carrier agree to the electronic transmission of bills of lading and/or freight bills and/or freight bill payment, the following rules will apply:

Rule 1 - Disposition of Loss or Damage Freight Claims

In the disposition of freight claims for loss or damage of property filed with the carrier, the shipper shall furnish a copy of the Bill of Lading Manifest referencing the exception taken at the time of pickup.

Rule 2 - Disposition of Overcharge or Duplicate Payment Claims

In the disposition of claims for overcharge or duplicate payment of freight charges with the carrier, the shipper shall furnish a computer-generated copy of the original electronically communicated freight bill.

Rule 3 - Bill of Lading Manifest Description and Process

The shipper shall electronically transmit a Bill of Lading for each shipment to the carrier prior to pickup, or the shipper shall generate a Bill of Lading Manifest. The carrier computer will take receipt of the Bill of Lading Manifest electronically transmitted by the shipper or, if bills of lading were transmitted by the shipper, the carrier computer generates the Bill of Lading Manifest. The Bill of Lading Manifest will include the following information prior to pickup:

- a. Carrier Pro Number or Shipper Identification Number.
- b. Number of shipping units and total weight of each shipment.
- c. Abbreviated summary of consignee name, city, state, and zip code.
- d. Prepaid or Collect billing status of each shipment.

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Page 2

- e. Identification of those shipments subject to C.O.D. provisions.
- f. Identification of those shipments containing hazardous materials.
- g. The date of shipment.
- h. Provisions enabling a shipper to exercise Section 7 of the Bill of Lading contract.
- i. Provisions enabling a shipper to exercise agreed or declared value provisions.
- j. Reference to the governing classification and carrier tariffs in effect on the date of the issue of the subject Bill of Lading Manifest including, but not limited to, the terms and conditions of the Bill of Lading contract.
- k. An area for exceptions will be furnished for each shipment.

The Bill of Lading Manifest shall be furnished by the carrier's pickup driver in lieu of the Bill of Lading document described in rule 4, Paragraph 4.1 of General Order 155.

Rule 4 - Accessorial Services

Accessorial services may be billed electronically provided the information required in Rule 5.2 of General Order 155 is included.

Rule 5 - Extension of Credit

The carrier may extend credit to the debtor for a period of seven days, excluding Sunday and legal holidays. The credit period will begin from the first 12:00 o'clock midnight following pickup of the freight.

Rule 6 - Issuance of Freight Bills

Freight bills will be tendered electronically provided the information required in Rule 5.1 of General Order 155 is included.

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Rule 7 - Retention and Retrieval of Records

Retention of records as provided in Rule 7.1 of General Order 155 shall be accomplished by storing all required documentation at on-line or off-line computer storage facilities for the required retention period of three years, except Bill of Lading Manifest which will be retained in hard copy form for the three-year period. Documents retained in computer storage shall be retrieved upon request from authorized parties.

Rule 8 - Rating, Billing, and Delivery Receipt Process

Exceptions noted on the Bill of Lading Manifest at the time of pickup shall be entered into the carrier's computer system by carrier personnel to update Bill of Lading information prior to the physical delivery of each shipment by the carrier. The updated Bill of Lading information shall be used to electronically rate and bill each shipment and electronically transmit a delivery receipt to the terminal responsible for performing the delivery.

Rule 9 - Freight Bill Payment Process

The shipper may electronically submit payment to the carrier for all prepaid shipping services immediately upon receipt of the electronic transmission by the carrier identifying the shipments subject to remittance or the debtor may self-invoice freight charges and remit freight bill payment electronically to the carrier.

(END OF APPENDIX A)

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The authority granted by this decision is subject to carrier's complying with the following conditions:

1. Staff will have access to the involved shippers' records pertaining to EDI shipments, including hard copies. As a condition of using EDI, shipper waives any proprietary rights or other claim of privilege against release of information to the staff or Commission. As used here, "shipper" includes any of the following which participates in EDI: (a) party arranging transportation, (b) consignor, (c) consignee, and (d) debtor.
2. Staff will have access to bank records of carrier and shippers for purpose of auditing EDI transactions. "Shipper" is as defined in "1." above.
3. Records of internal audits of carrier and shippers involving EDI will be made available to staff.
4. Records of outside audits of carrier and shippers involving EDI will be made available to staff.
5. Carrier will make a computer terminal available to staff investigator with or without advance notice and assist staff in its examination of EDI records.
6. Upon request, carrier will assist staff investigator in entering EDI system and reviewing data using Commission-owned portable computer terminal.
7. In connection with the transportation of hazardous materials and hazardous wastes, the provisions of Paragraphs 1 through 6 above shall apply for the California Highway Patrol and the Department of Health Services.
8. Carrier will establish a procedure acceptable to staff to ensure that shipper-generated requests or orders for split pickup service or split delivery service conform to procedures

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set forth in Items 162 and 172, former
Transition Tariff 2.

9. Initially, limited-term authority would be granted. Carrier would be required to file progress reports with the Commission in format to be devised by staff.
10. Provide and update the name and telephone number of an individual designated as liaison with the staff for purposes pertaining to EDI.
11. Establish a carrier-controlled shipment numbering system that cannot be modified by shippers.

(END OF APPENDIX B)

Decision 89 04 049 APR 12 1989

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In support of this request, Viking alleges generally as follows:

The GO departures requested by Viking would allow it to establish a "paperless" bill of lading and freight bill process. Before marketing this service Viking began a series of communications, both written and oral, in March 1988 with the Commission's Transportation Division to clarify any legal roadblocks which would deny Viking the ability to adopt this procedure. These communications led the carrier to present the prepared testimony of Ed Hulton on behalf of Viking and the California Coalition For Trucking Deregulation in the ongoing investigation of the transportation of general freight (I.88-08-046).

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Conclusions of Law

1. The application should be granted for a period of one year unless sooner modified, terminated, or extended.

2. Transportation Division should be directed to monitor the activity granted by this decision, and report to the Commission not less than 60 days prior to expiration of this authority on whether it believes the authority should be modified, terminated, or extended.

3. Since there appears to be an immediate opportunity for Viking and shippers to achieve efficiencies and savings, and the application has not been protested, the effective date of this decision should be today.

INTERIM ORDER

IT IS ORDERED that:

1. Viking Freight System, Inc. is authorized to publish, on 5 days' notice, the rules set forth in Appendix A to this decision.

2. The authority granted by this decision shall expire one year after today, unless sooner terminated, modified, or extended by the Commission.

3. The Commission's Transportation Division shall monitor the activity authorized by this decision, and shall report to the Commission the results of its monitoring with a recommendation on whether the authority should be modified, terminated, or extended.

A.89-02-006 ALJ/JSL/vdl

This report shall be presented to the Commission not less than 60 days prior to the expiration of the authority granted herein.

This order is effective today.

Dated _____, at San Francisco, California.

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