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May 2, 2014

FILED ELECTRONICALLY

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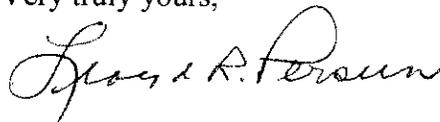
**Re: Application of Lyft, Inc.
A-2014-2415047**

Secretary
PA Public Utility Commission
2nd Floor, Commonwealth Keystone Building
Harrisburg, PA 17110

Dear Sir or Madam:

We file herewith on behalf of Billtown Cab Co., Inc., Protestant, its original Protest to this Application.

Very truly yours,



Lloyd R. Persun

LRP:ajh
Attachment

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In Re: : A-2014-2415047
:
Lyft, Inc. : **FILED ELECTRONICALLY**

PROTEST OF BILLTOWN CAB CO., INC.

AND NOW, this 2nd day of May, 2014, BILLTOWN CAB CO., INC., Protestant, by its attorneys, files this Protest to this Application and in support thereof avers as follows:

1. The name, address and telephone number of Protestant are:

Billtown Cab Co., Inc.
3575 West Fourth Street
Williamsport, PA 17701
(570) 322-3600

2. The name, address and telephone number of Protestant's attorneys are:

Lloyd R. Persun, Esquire
Persun & Heim, P.C.
P.O. Box 659
Mechanicsburg, PA 17055-0659
(717) 620-2440

3. Protestant possesses authority at A.00111341 and various folders and amendments thereunder with which the Application conflicts. Protestant's said operating authority is described on Exhibit "A" attached hereto and made a part hereof.

4. To the extent of such conflict there is no need or immediate need for the service which is proposed in the Application (the “proposed service”).

5. No need or immediate transportation need exists. Protestant has not discontinued any service or failed to provide service within its operating authority. Protestant has not refused any request for service. Protestant is able and willing to provide equipment necessary to meet existing transportation needs. Protestant is ready, willing and able to provide service to the public.

6. Approval of the Application is not necessary or proper for the accommodation, service, necessity or safety of the public. Applicant is not fit to provide the proposed service.

7. Entry of a new carrier into the area of conflict between the proposed service and Protestant’s operating authority will impair the operations of existing carriers including Protestant.

8. Applicant identifies Transportation Network Company (TNC) as the “Certificated Entity”. On information and belief, TNC does not possess a Certificate of Public Convenience from the Commission. TNC not Lyft, Inc. is the proper applicant. The Application was not advertised correctly. It should be dismissed.

9. Applicant filed an Application with the Commission seeking to provide the same service between points in Allegheny County. (A-2014-2415045). 44 Pennsylvania Bulletin 2493 (4-19-14). This Application should be dismissed to the extent that it duplicates the Allegheny County Application.

10. Protestant is not aware of a Restrictive Amendment which would satisfy its interest. However, Protestant is willing to discuss the possibility of a Restrictive Amendment with Applicant, if Applicant so desires.

WHEREFORE, Protestant respectfully requests that the Application be dismissed with prejudice or, in the alternative, that the Application be scheduled for hearing as on-the-record proceeding and that Protestant be permitted to participate in that proceeding as a party.

Respectfully submitted,



Lloyd R. Persun, Esquire

Persun & Heim, P.C.

P.O. Box 659

Mechanicsburg, PA 17055-0659

(717) 620-2440

Attorneys for Billtown Cab Co., Inc.,
Protestant

EXHIBIT "A"

To transport, as a common carrier, by motor vehicle, persons upon call or demand in the City of Williamsport and the boroughs of South Williamsport and DuBoistown, Lycoming County, and within an airline distance of five (5) statute miles of the limits of the said city and boroughs (A.00111341).

To transport, as a common carrier, persons in paratransit service, between points in the county of Lycoming subject to the following conditions:

That the applicant shall comply with all rules and regulations as set forth in 52 Pa. Code §29.353(l) and 29.354.

That no right, power or privilege is granted to provide transportation for Consolidated Rail Corporation, or its successors (A.00111341).

To transport, as a Class D carrier, in taxicabs, property, in parcels or packages, no single parcel, package or article to exceed ten (10) pounds in weight, between points in the city of Williamsport and the boroughs of South Williamsport and DuBoistown, Lycoming County, and within an airline distance of five (5) statute miles of the limits of said city and boroughs, and from said city and boroughs to points within an airline distance of fifty (50) statute miles of the limits of the said city and boroughs, and vice versa (A.00111341).

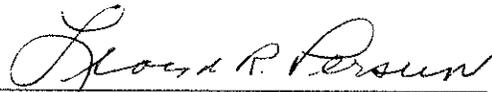
To transport, as a common carrier, persons in airport transfer service from points in the counties of Lycoming and Clinton, to the Williamsport-Lycoming County Airport in the borough of Montoursville, Lycoming County, the University Park Airport in Benner Township, Centre County, the Wilkes-Barre/Scranton Airport in Pittston Township, Luzerne County, the Harrisburg International Airport in the borough of Middletown and Lower Swatara Township, Dauphin County, the Capital City Airport in the borough of New Cumberland, Cumberland County, and Fairview Township, York County, and the Philadelphia International Airport, in the city and county of Philadelphia and the Township of Tinicum, Delaware County (A.00111341).

EXHIBIT "A"

CERTIFICATE OF SERVICE

I, Lloyd R. Persun, Esquire, hereby certify that a copy of the foregoing Protest was served on May 2, 2014 by United States mail, first class, postage prepaid, upon the following addressed as follows:

James P. Dougherty, Esquire
Barbara A. Darkes, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166



Lloyd R. Persun
Lloyd R. Persun, Esquire
Attorney for Billtown Cab Co., Inc.