Law Offices

John A. Vuono William A. Gray Mark T. Vuono* Dennis J. Kusturiss Louise R. Vuono William H. Stewart, III Erica G. Wilson Paul J. Gitnik, Of Counsel

*Also Admitted in Florida

VUONO & GRAY, LLC

310 Grant Street, Suite 2310

Pittsburgh, PA 15219-2383

March 23, 2016

Re: Clarion County Taxi, Inc. Proposed Rulemaking Order Docket No. L-2015-2507592 Our File: 5018

MAILED WITH U.S. POSTAL SERVICE CERTIFICATE OF MAILING FORM 3817

Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

Dear Ms. Chiavetta:

Ms. Rosemary Chiavetta

Secretary

We enclose for filing with the Commission the signed original of the Comments of Clarion County Taxi, Inc. in opposition to the Proposed Rulemaking Order at Docket No. L-2015-2507592.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed, stamped envelope provided.

Very truly yours,

VUONO & GRAY, LLC

William A./Gray

mm/161701 Enclosures cc: Clarion County Taxi, Inc. (w/enc.)

MOISEIMINE S YAALASION SECKETARY S SOUMERSION

3105 8 3 3 2016



Telephone 412-471-1800

Facsimile 412-471-4477

www.vuonogray.com Email Address wgray@vuonogray.com

Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: PROPOSED RULEMAKING ORDER

DOCKET NO. A-2012-2290603

RECEIVED

MAR 2 3 2016

PA PUBLIC UTILITY COMMISSION

COMMENTS OF TIM J. WOLLASTON ON BEHALF OF CLARION COUNTY TAXI, INC. IN OPPOSITION TO PROPOSED RULEMAKING ORDER

The Commission published in the <u>Pennsylvania Bulletin</u> dated February 27, 2016, a proposed rulemaking order to amend the existing regulations governing call or demand carriers to eliminate the public demand or need requirement. Clarion County Taxi, Inc. ("Clarion County Taxi") objects to the proposal to eliminate this requirement.

The business address of Clarion County Taxi is P.O. Box 180, 2177 East End Road, Shippenville, PA 16254. Clarion County Taxi has authority at Docket No. A-00111683 authorizing it to provide call or demand service in the counties of Clarion and Jefferson. Clarion County Taxi has provided service under its PUC authority on a regular, continuing basis since it was first certificated on December 6, 1995.

As will be discussed below, Clarion County Taxi believes that the Commission should continue to handle call or demand applications in the same manner that it has handled such applications in the past and continues to handle such applications at the present time.

Clarion County Taxi believes that there is a need to continue to regulate the number of taxicab companies that provide service in Pennsylvania and, in particular, in the territory which

Clarion County Taxi is authorized to serve, which are the rural counties of Clarion and Jefferson. If the public demand/need requirement is eliminated, the obvious result will be that anyone that wants to secure call or demand or call or demand authority will be able to secure such authority. There is already enough competition in the area served by Clarion County Taxi and the additional local competition that would result may cause existing companies to go out of business.

Most taxicab companies in rural areas in Pennsylvania, including Clarion County Taxi, are small operators who have built their business on providing local service to the public. The addition of the new competition that will result will have a negative financial effect on these companies, including Clarion County Taxi, which will far outweigh any benefit to the public. Existing companies have invested significant time and financial resources to provide the service required by the public.

Clarion County Taxi has made a substantial investment in its operating authority and in its equipment. This investment will be substantially in jeopardy if the proposed changes are put into effect.

For all of the above reasons, Clarion County Taxi opposes the proposed change set forth in the <u>Pennsylvania Bulletin</u> dated February 27, 2016.

Respectfully submitted, **VUONO & GRA** . LLC By: William A. Grav. Esq. Attorneys for Clarion/County Taxi, Inc.

VUONO & GRAY, LLC 310 Grant Street, Suite 2310 Pittsburgh, PA 15219 412-471-1800

/161550

VERIFICATION

I verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

Tim J. Wollaston, President

Dated: 3-17-2-0/6

• i

~



Law Offices **VUONO & GRAY, LLC** 310 Grant Street, Suite 2310 Pittsburgh, PA 15219-2383 **TO:** Ms. Rosemary Chiavetta Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17.105-3265

This Certificate of Mailing provi This form may be used for dom	des evidence that mail has be estic and international mail.	121	(3)×)	
From: Vuono & G	ray LLC	10/	1010 22	
310 Grant	- Street, Su	ite 2310 u	SPS 1	
Pittshurgh	PA 15219	-2383	200	180000
Re: 5015	<u>►</u>		18688	
				No.
To: Rosemory	Chiquetta.	Secretary	×5.4	M
Pennsylvanio	Public 1Hili	ty Counsission	o	Э
DA Ray 2	2.65	0-01-0		0
P. O. BOX S		- 27/5	112	
Harrisburg	, PIA 1710	5-3265	15219 1242930	С С
PS Form 3817, April 2	007 PSN 7530-02-00	0-9065	30	10