

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

Telephone
412-471-1800

Facsimile
412-471-4477

www.vuonogray.com

Email Address
wgray@vuonogray.com

March 23, 2016

Re: Jeannette E. M. S., Inc.
Proposed Rulemaking Order
Docket No. L-2015-2507592
Our File: 4434

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Ms. Chiavetta:

We enclose for filing with the Commission the signed original of the Comments of Jeannette E. M. S., 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/161697

Enclosures

cc: Jeannette E. M. S., Inc. (w/enc.)

RECEIVED
PA P.U.C.
SECRETARY'S BUREAU

2016 MAR 23 AM 10:24
mm

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RE: PROPOSED RULEMAKING ORDER

DOCKET NO. L-2015-2507592

COMMENTS OF RANDY HIGHLANDS
ON BEHALF OF JEANNETTE E. M. S., INC.
IN OPPOSITION TO
PROPOSED RULEMAKING ORDER

The Commission published in the Pennsylvania Bulletin dated February 27, 2016, a proposed rulemaking order to amend the existing regulations governing passenger motor carriers to eliminate the public demand or need requirement for applications for authority. Jeannette E. M. S., Inc. (“Jeannette”) objects to the proposal to eliminate this requirement.

The business address of Jeannette is 225 South Sixth Street, Jeannette, PA 15644. Jeannette has authority at Docket No. A-00114815 authorizing it to provide paratransit service between certain points in Westmoreland County, and from said points to points in Pennsylvania. Jeannette has provided service under its PUC authority on a regular, continuing basis since it was first certificated on September 3, 1997.

As will be discussed below, Jeannette believes that the Commission should continue to handle paratransit applications in the same manner that it has handled such applications in the past and continues to handle such applications at the present time.

Jeannette firmly believes that there is a need to regulate the number of paratransit companies that can provide service in Pennsylvania and, in particular, in the territory which

Jeannette is authorized to serve. If the public demand/need requirement is eliminated, the obvious result will be that anyone that wants to secure paratransit authority will be able to secure such authority. There is already substantial competition in this industry and the addition of new companies in the industry may cause existing companies to go out of business.

Most of the paratransit service providers in our area 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 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.

Jeannette 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, Jeannette E. M. S., Inc. opposes the proposed change set forth in the Pennsylvania Bulletin dated February 27, 2016.

Respectfully submitted,

VUONO & GRAY, LLC

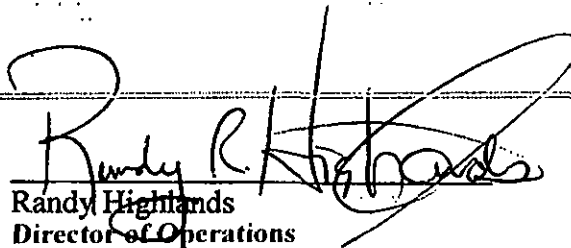
By: _____

William A. Gray, Esq.
Attorneys for
Jeannette E. M. S., Inc.

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

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.


Randy Highlands
Director of Operations

Dated: 3/18/2016

neopost[®]

FIRST-CLASS MAIL

03/23/2016

US POSTAGE

\$01.20⁰



ZIP 15219
041L11242930

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 17105-3265



**UNITED STATES
POSTAL SERVICE**

**Certificate Of
Mailing**

To pay fee, affix stamps or
meter postage here.

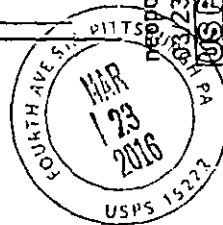
This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.
This form may be used for domestic and international mail.

From: Vuono & Gray, LLC
310 Grant Street, Suite 2310
Pittsburgh PA 15219-2383
Re: 4434

To: Rosemary Chavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg PA 17105-3265

\$01.35⁰⁰

ZIP 15219
04111242930



PS Form 3817, April 2007 PSN 7530-02-000-9065