

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*

Law Offices

## 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 28, 2016

Re: Green's Taxi, Inc.  
Proposed Rulemaking Order  
Docket No. L-2015-2507592  
Our File: 5326

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 Green's 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

as/161017

Enclosures

cc: Green's Taxi, Inc. (w/enc.)

**RECEIVED**

MAR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

---

RE: PROPOSED RULEMAKING ORDER

DOCKET NO. L-2015-2507592

---

COMMENTS OF THOMAS W. BRUCE  
ON BEHALF OF GREEN'S TAXI, 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. Green's Taxi, Inc. ("Green's Taxi") objects to the proposal to eliminate this requirement.

The business address of Green's Taxi is 8200 Noblestown Road, McDonald, PA 15057. Green's Taxi has authority at Docket No. A-00115729 authorizing it to provide call or demand and paratransit service between points in the counties of Allegheny and Washington, and from points in said counties to points in Pennsylvania. Green's Taxi has provided service under its PUC authority on a regular, continuing basis since it was first certificated in 1999.

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

RECEIVED

MAR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Green's Taxi believes that there is a need to regulate the number of taxicab and paratransit companies that can provide intrastate service in Pennsylvania and, in particular, in the territory which Green's Taxi is authorized to serve. If the public demand/need requirement is eliminated, the obvious result will be that anyone that wants to secure call or demand or 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.

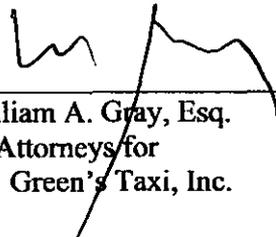
Most companies in this industry are small operators who have built their business on providing local service to the public. The addition of the new competition that will result will have a negative financial effect on these companies which will far outweigh any benefit to the public. Existing companies have invested significant time and financial resources to obtain their authority and provide the service required by the public.

Green's 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, Green's Taxi opposes the proposed change set forth in the Pennsylvania Bulletin dated February 27, 2016.

Respectfully submitted,

VUONO & GRAY, LLC

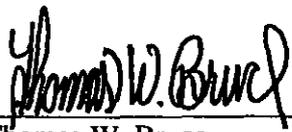
By:   
\_\_\_\_\_  
William A. Gray, Esq.  
Attorneys for  
Green's Taxi, Inc.

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

/161019

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.

  
\_\_\_\_\_  
Thomas W. Bruce

Dated: 3/28/16

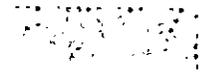
RECEIVED

MAR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

POSTNET  
03/28/2016  
U.S. POSTAGE

511-155  
\$01.20<sup>0</sup>



ZIP 15219  
041L 1242930

**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