

*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](http://www.vuonogray.com)

Email Address  
[wgray@vuonogray.com](mailto:wgray@vuonogray.com)

March 28, 2016

Re: Millcreek Paramedic Service, Inc.  
Proposed Rulemaking Order  
Docket No. L-2015-2507592  
Our File: 5362

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**

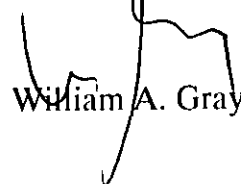
Dear Ms. Chiavetta:

We enclose for filing with the Commission the signed original of the Comments of Millcreek Paramedic Service, 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/161676

Enclosures

cc: Millcreek Paramedic Service, 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 BETHANY STRONGHART  
ON BEHALF OF MILLCREEK PARAMEDIC SERVICE, 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. Millcreek Paramedic Service, Inc. (“Millcreek”) objects to the proposal to eliminate this requirement.

The business address of Millcreek is 3606 West 26<sup>th</sup> Street, Erie, PA 16506. Millcreek has authority at Docket No. A-001 16034 authorizing it to provide paratransit service from points in Erie County to points in Pennsylvania. Millcreek has provided service under its PUC authority on a regular, continuing basis since it was first certificated in 2009.

As will be discussed below, Millcreek 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.

Millcreek 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 Millcreek 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.

Millcreek 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, Millcreek 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

Millcreek Paramedic Service, Inc.

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

**RECEIVED**

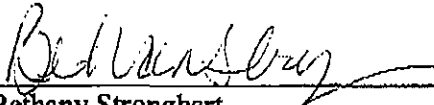
MAR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

/161630

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.

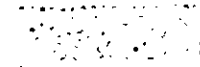
  
Bethany Stronghart

Dated: 3-28-2016

RECEIVED  
MAR 28 2016  
PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

neopost  
03/28 2016  
US PSN001

\$0.20



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