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Re:

September 23, 2016

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SECRETARY'S BUREAU

PA PUBLIC UTILITY COMMISSION

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265

Docket No. L-2016-2556432

Advanced Notice of Temporary Rulemaking Order

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

Dear Ms. Chiavetta:

Harrisburg, PA 17105-3265

We enclose for filing with the Commission the signed original of the Comments of Clarion County Taxi, Inc. in connection with the Advanced Notice of Temporary Rulemaking Order at Docket No. L-2016-2556432.

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,

VIJONO & GRAY, LLC

William A. Gray

as/168714 Enclosures

cc: George Wollaston



Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BURFALL

RE: ADVANCE NOTICE OF TEMPORARY RULEMAKING ORDER DOCKET NO. L-2016-2556432

COMMENTS OF TIM J. WOLLASTON ON BEHALF OF CLARION COUNTY TAXI, INC.

The Commission published in the <u>Pennsylvania Bulletin</u> dated August 27, 2016, an Advance Notice of Temporary Rulemaking Order to promulgate temporary regulations consistent with Act 85 of 2016. The Advance Notice of Temporary Rulemaking Order provided that written comments can be submitted within 30 days of publication in the <u>Pennsylvania Bulletin</u>. Clarion County Taxi, Inc., hereby submits the comments set forth below.

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.

Clarion County Taxi respectfully submits that the Commission should change the taxicab regulations to permit taxicab companies to utilize flexible rates in the same manner as it permits TNC's to use flexible rates. Taxicab companies provide service very similar in many respects to TNC's but the one main difference is that taxicab companies are required at all times to charge

their published tariff rates while TNC's are not required to do so, which puts taxicab companies at a competitive disadvantage with TNC's. There is no legitimate reason for continuing to require taxicab companies to charge the specific rates set forth in their tariffs while at the same time permitting TNC's to charge flexible rates. Clarion County Taxi therefore proposes in these comments that taxicab companies be treated the same as TNC's from a tariff standpoint and be permitted to charge flexible rates rather than specific rates.

Respectfully submitted,

VUONO & GRAY, LLC

Attorneys for

Clarion County Taxi, Inc.

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

/168679

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. Wanaston, President

Dated: 9-77-2016

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU



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TO:

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