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Re:

September 23, 2016

Advanced Notice of Temporary Rulemaking Order

RECEIVED

SEP 2 3 2016

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

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

Docket No. L-2016-2556432

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 Star Limousine Service, Inc., Cranberry Taxi, Inc., Air Star Transportation and Limousine Service, Inc. and Classy Cab Company, 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,

VUONO & GARAY, LLC

William A. Gray

mm/168714 Enclosures

cc: Derek A. DeLucia, Sr.



Before the PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC WILLITY COMMISSION SECRETARY'S BUREAU

RE: ADVANCE NOTICE OF TEMPORARY RULEMAKING ORDER

DOCKET NO. L-2016-2556432

COMMENTS OF DEREK A. DELUCIA, SR.
ON BEHALF OF STAR LIMOUSINE SERVICE, INC., CRANBERRY TAXI, INC. D/B/A/
VETERANS TAXI, AIR STAR TRANSPORTATION AND LIMOUSINE SERVICE, INC.
AND CLASSY CAB COMPANY, 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</u> <u>Bulletin</u>. Star Limousine Service, Inc., Cranberry Taxi, Inc., Air Star Transportation and Limousine Service, Inc. and Classy Cab Company, Inc. (hereinafter referred to as "the Star Transportation Group"), hereby submit the comments set forth below.

The Star Transportation Group consists of two companies holding call or demand authority (Cranberry Taxi, Inc. d/b/a Veterans Taxi and Classy Cab Company, Inc.) and two companies holding limousine authority (Star Limousine Service, Inc. and Air Star Transportation and Limousine Service, Inc.). The companies in the Star Transportation Group all provide service pursuant to their authority under tariffs on file with the Commission. These companies are all legally required to charge the rates set forth in those tariffs.

Taxicab and limousine companies directly compete with TNC's and are at a competitive disadvantage by having to charge the specific rates set forth in their tariff at all times.

TNC companies are not required to publish tariffs with specific rates but rather are permitted to file tariffs with flexible rates. There is no legitimate reason for continuing to require taxicab and limousine companies to charge the specific rates set forth in their tariffs while at the same time permitting TNC's to charge flexible rates. The Star Transportation Group therefore proposes in these comments that taxicab and limousine 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, LILO

By:

William A. Gray/Esq.

Attorneys for

Star Limousine Service, Inc.

Air Star Transportation and Limousine

Service, Inc.

Cranberry Taxi, Inc.

Classy Cab Company, Inc.

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

/168705

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.

9/22/16

Derek A. DeLucia, President

SEP 2 3 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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From: Vuono & Gray, LLC

310 Grant Street, Suite 2310

Pittshurgh A 15219-2383

Re: Star L-2016-2556432

To: Rosenary Chavetta Secretary

Pennsylvania Public Utility Communistion

P. O. Box 3265

Harrishurg PA 17105-3265

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

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TO:

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