

Greater Valley Emergency Medical Services 904 North Lehigh Avenue, Sayre, PA 18840-1842

Phone (570) 888-6000 - FAX (570) 888-1219 A Non-Profit, 501C3 Corporation

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July 21, 2017

Pennsylvania Public Utility Commission Attn: Secretary Rosemary Chiavetta Commonwealth Keystone Building, 2nd Floor 400 North Street Harrisburg, PA 17120

Re: Docket Number L-2017-2600599

Dear Secretary Chiavetta:

Greater Valley Emergency Medical Services writes in support of the proposed rulemaking under Docket Number L-2017-2600599. Greater Valley EMS is a not-for-profit ambulance service that also holds a PUC certificate to provide medical taxi, wheelchair van, and stretcher van services to the northern tier of Bradford County. In 2016, we provided transportation for 1,800 intrastate paratransit requests.

The proposed rulemaking under the above-referenced docket number will create job opportunities for qualified candidates at agencies such as ours. Currently, the Commission's regulations have a negative impact on our organization and our ability to employ persons 18-21 years of age. Our EMTs are dual role ambulance and paratransit staff. Because of the Commission's current requirements, we are unable to hire EMTs under 21 years of age even though they may be certified EMS Vehicle Operators through the Department of Health, because they are not able to operate a wheelchair van under PUC regulations.

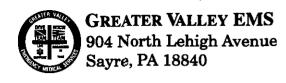
The Commission's proposed rulemaking will increase the pool of candidates for paratransit operations and allow EMS and paratransit operators to extend job offers to appropriately credentialed drivers aged 18-21. At the same time, it will improve safety of paratransit operations, as those drivers will have completed a formal driver training program for their EMS Vehicle Operator certificate. The proposed rulemaking will allow us to hire a safer, more trained 18 year old credentialed EMS Vehicle Operator that is also able to operate wheelchair vans. We look forward to this opportunity and we appreciate the Commission's recognition of the current issue and the willingness to defer to the credentialing system of the DOH EMS Bureau for assistance in resolving the issue for dual-role services such as ours.

Thank you for your consideration of Docket Number L-2017-2600599. Greater Valley EMS supports this effort.

Yours in service,

Derrick P. Hall, BA, NRP Executive Director

The Leader in Emergency Medical Services, Transportation and Community Health Resources





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