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March 1, 2010

James J. McNulty, Secretary
Commonwealth of Pennsylvania
Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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Re: A-2010-2155021. Modern Motor Coaches, Inc. d/b/a Modern Piano Moving

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of a Protest pertaining to the above-captioned Application on behalf of my clients, as listed below:

Thank you for your cooperation in this matter.

Very truly yours,


WILLIAM H.R. CASEY

WHRC/mw
Enclosures

cc: Fiamingo Moving and Storage, Inc.
Modern Motor Coaches, Inc. w/ enclosures

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

A-2010-2155021. Modern Motor Coaches, Inc. d/b/a Modern Piano Moving (992 Highway D. Sullivan, MO 63080) household goods in use, limited to pianos and organs, between points in Pennsylvania.

PROTEST OF:

Dominick Fiamingo
Fiamingo Moving and Storage, Inc.
3465 N. 6th Street
Harrisburg, PA 17110
717-234-3145
A-00104227

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The Protestants, above named, supplying household goods in use transportation services within the territory covered by the above-entitled Application, or a portion thereof, by means of motor vehicles, as shown on attached rights, hereby protest approval of the Application above referred to, among others, for the following reasons:

1. The Application prayed for is not necessary or proper for the service, accommodation, convenience or safety of the public.
2. The Application prayed for, if granted would authorize a service which would be unnecessary and destructively competitive with rights, powers and privileges now being exercised by Protestants or which Protestants are authorized to exercise.


PROPOSED AMENDMENT

A RESTRICTION TO THE APPLICATION WOULD BE ACCEPTABLE IF TRANSPORTATION OF HOUSEHOLD GOODS IN USE AND RELATED RIGHTS OF PROTESTANTS WERE ELIMINATED.

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WHEREFORE, the Protestants respectfully pray that the Application be dismissed.

Respectfully submitted,



WILLIAM H. R. CASEY, ESQUIRE
Attorney for Protestants
99 East Court Street
Doylestown, PA 18901
(215) 348-7300

Date: 3/1/10
Attachment: Protestants' Authority

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PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17130

Public Meeting held November 19, 1982

Commissioners Present:

Susan M. Shanahan, Chairman
Michael Johnson
James H. Cawley
Linda C. Taliaferro
Clifford L. Jones

Application of Flamingo Moving and Storage, Inc., for approval of the transfer to it of all of the operating rights held by Anthony D. Flamingo, t/a Flamingo Moving and Storage at A-00098031.

A-00104227

O R D E R

BY THE COMMISSION:

By application docketed August 4, 1982, Flamingo Moving and Storage, Inc., a corporation of the Commonwealth of Pennsylvania, seeks approval of the transfer to it of all the rights granted to Anthony D. Flamingo, t/a Flamingo Moving and Storage under the certificate issued at A-00098031.

We find the applicant to be fit to hold a certificate of public convenience and that approval of the application is necessary and proper for the continuation of service to the public; THEREFORE,

IT IS ORDERED: That the application for the transfer of rights held by Anthony D. Flamingo, t/a Flamingo Moving and Storage at A-00098031 be approved and that a certificate be issued to the applicant granting the following rights:

1. To transport, as a Class D carrier, household goods and office furnishings, in use, between points in the county of Tioga and from points in said county to other points in Pennsylvania, and vice versa.
2. To transport, as a Class D carrier, household goods, personal effects and property used or to be used in a dwelling, when a part of the equipment or supplies of such dwelling, as an incidental part of a removal by the householder from one domicile to another; furniture, fixtures, equipment and property of stores, offices, museums, institutions, hospitals or other establishments, when a part of the stock, equipment or supply of such stores, offices, museums, institutions, hospitals or other establishments, in connection



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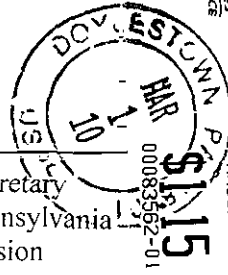
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From: _____
_____ William H. R. Casey, Esq.
_____ Law Office
_____ 99 East Court Street
_____ Doylestown, PA 18901

James J. McNulty

_____ James J. McNulty, Secretary
_____ Commonwealth of Pennsylvania
_____ Public Utility Commission
_____ P.O. Box 3265
_____ Harrisburg, PA 17120



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d/b/a Modern Piano Moving