

CRAIG A. DOLL

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August 23, 2010

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

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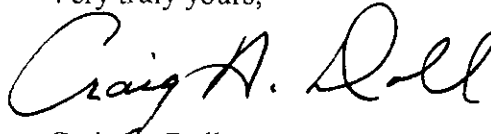
Re: Application of United Medical Transport, LTD
Commission Docket No. A-2010-2189481

Dear Ms. Chiavetta:

Enclosed are an original and three (3) copies of the Protest of Global Medical Transportation Services, Inc. to the Application of United Medical Transport, LTD. A copy of this protest has been served upon Applicant' counsel of record and all parties of record as evidenced by the Certificate of Service appended to the Protest.

Please time stamp the additional copy. If you have any questions, please feel free to contact me. Thank you for your time and cooperation in this matter.

Very truly yours,


Craig A. Doll

cc: Per Certificate of Service
Global Medical

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of United Medical Transport LTD.
for the right to begin to transport, as a
common carrier, by motor vehicle, persons
in paratransit service from points in the
Counties of Philadelphia, Bucks, Montgomery,
Lehigh and Northampton, to points in
Pennsylvania, and return.

Commission Docket No.
A-2010-2189481

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**PROTEST OF
GLOBAL MEDICAL TRANSPORTATION SERVICES, INC.**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Global Medical Transportation Services, Inc. ("Global" or "Protestant") is a certificated motor carrier in the Commonwealth of Pennsylvania by virtue of a Certificate of Public Convenience issued by this Commission at Docket Number A-00121497. Pursuant to the provisions of 52 Pa. Code §3.381(c), Global, by and through its undersigned counsel, hereby files this Protest to the Application of United Medical Transport LTD ("United" or "Applicant").

In support of this Protest, Global states as follows:

1. The name and business address of Protestant are:

Global Medical Transportation Services, Inc.
1801 W. Market Street
Bethlehem, PA 18018

2. The name, business address, telephone number, and email address of Protestant's attorney are:

Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403
(717) 566-9000
cdoll76342@aol.com

3. Global possess the requisite legal standing to protest this application. This Commission has recognized that the controlling principle relating to standing in this type of proceeding is whether a protestant has some operating authority in actual or potential conflict with the authority sought by an applicant. *Application of Premium Taxi, LLC, A-00121698* (August 25, 2006); *Application of Unique Limousine Service, Inc., A-0104709, F.2, Am-A* (March 7, 2006). Global currently provides certificated paratransit service from points in the counties of Monroe, Carbon, Lehigh, and Northampton to points in Pennsylvania and return, pursuant to a Certificate of Public Convenience issued by this Commission at A-00121497. Applicant is seeking to provide paratransit service from, *inter alia*, from points in Lehigh and Northampton Counties to points in Pennsylvania and return, which proposed service territory would be in conflict with the authority granted to Global by this Commission. Appended hereto as Exhibit A is a copy of the applicable Commission Order granting authority to Global.

4. Approval of the above application will not serve a useful public purpose responsive to a public demand or need as required by the Pennsylvania Public Utility Code and this Commission's regulations, but will duplicate already existing services provided by Global and

other carriers within the proposed service territory. There is no evidence of need for the proposed service.

5. The equipment and facilities of Global are ample to meet all of the requirements of the public to and from points in Lehigh and Northampton Counties. The granting of the application will have a detrimental effect upon the operations of Global as well as the traveling public in *that it will only serve to divert revenues necessary for Global to provide a quality service product responsive to the needs of the public.*

6. Approval of this application will be prejudicial to Global as well as the traveling public since it will authorize additional unnecessary and harmful competition with the potential loss of revenues and deterioration in the quality and quantity of service currently being furnished to the public.

7. The entry of Applicant into the field would endanger or impair the operations of Global through the diversion of passengers to such an extent that the granting of the authority would be contrary to the public interest.

8. Applicant has provided no information regarding its technical or financial fitness, insurance coverage, its plans for compliance with the Commission's driver and vehicle safety regulations and/or service standards, or any other information required by this Commission's regulations regarding Applicant's financial condition. As such, Global states that Applicant is *neither technically or financially fit to provide the proposed service.*

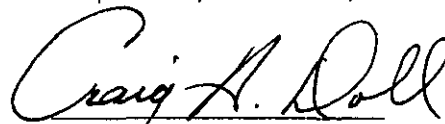
9. The application is defective on its fact in that the copy obtained by Protestant from the Commission does not contain the information required within paragraph 8 of the Commission's application form.

10. Global is unaware of any restrictive amendment which will permit it to withdraw its protest.

11. Protestant hereby requests that Applicant furnish it with a list of all witnesses that are prepared to testify on Applicant's behalf.

WHEREFORE, Global Medical Transportation Services, Inc. respectfully requests that this Commission dismiss the application of United Medical Transport LTD.

Respectfully submitted,

A handwritten signature in black ink that reads "Craig A. Doll". The signature is written in a cursive style with a horizontal line underneath the name.

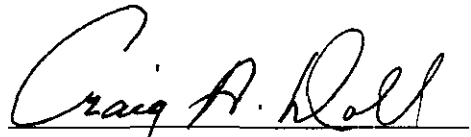
Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403
(717) 566-9000
Attorney I.D. # 22814

Attorney for Global Medical Transportation
Services, Inc.

Dated: August 23, 2010

ATTORNEY'S VERIFICATION

I, Craig A. Doll, Esquire, attorney for Global Medical Transportation Services, Inc. hereby verify that I have become acquainted with the facts and information set forth in the foregoing document; that the same are true to the best of my knowledge information and belief; and that the foregoing verification is made subject to the penalties of 18 Pa. C.S. § 4904.



Craig A. Doll, Esquire

DATED: August 23, 2010

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of United Medical Transport LTD.
for the right to begin to transport, as a
common carrier, by motor vehicle, persons
in paratransit service from points in the
Counties of Philadelphia, Bucks, Montgomery,
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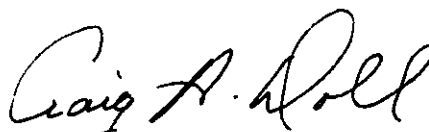
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the Protest of Global Medical Transportation Services, Inc. to the Application of United Medical Transport LTD upon the persons listed below via the method stated in accordance with the provisions of 52 Pa. Code §1.54.

First Class Mail

David M. Hollar, Esquire
8 Tower Bridge, Suite 400
161 Washington Street
Conshohocken, PA 19428



Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
Hummelstown, PA 17036-0403

(717) 566-9000
(717) 566-9901 (fax)
Cdoll76342@aol.com

Attorney for Protestant
Global Medical Transportation Services, Inc.

DATED: August 23, 2010

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held March 22, 2007

Commissioners Present:

**Wendell F. Holland, Chairman
James H. Cawley, Vice Chairman
Kim Pizzingrilli
Terrance J. Fitzpatrick**

Application of Global Medical Transportation Services, Inc., a corporation of the Commonwealth of Pennsylvania, for the right to begin to transport, as a common carrier, by motor vehicle, persons in paratransit service, from points in the counties of Carbon, Lehigh, Monroe, and Northampton, to points in Pennsylvania, and return.

A-00121497

Timothy J. Prendergast for the applicant.
Page, Wolfberg & Wirth, LLC by Christie M. Mellott for protestants: Safecare Ambulance Service, Inc., t/a Network Ambulance Service and Suburban Emergency Medical Services

BY THE COMMISSION:

This matter comes before the Commission on an application filed November 22, 2004. Public notice of the application was given in the *Pennsylvania Bulletin* of March 12, 2005, with protests due by April 4, 2005. Two protests were filed by the above-mentioned carriers. The application was referred to the Office of Administrative Law Judge on April 25, 2005, for processing. The protests were withdrawn upon restrictive amendment. The case was referred back to the Bureau of Transportation and Safety on August 23, 2006, for processing under modified procedure; however, due to a procedural oversight, the case was not received by the Bureau of Transportation and Safety until October 12, 2006.

The verified statement of applicant and verified statements in support were requested by letter dated October 12, 2006, with statements due by November 12, 2006. The Commission was not notified of an address change; therefore, the letter was returned by the U.S. Postal Service. Another request was sent on October 17, 2006, with statements due by

EXHIBIT "A"

November 17, 2006. An extension was given until December 29, 2006. A second extension was requested and was granted allowing an additional 30 days. The verified statements of the applicant and nine verified statements in support were submitted on January 29, 2007.

The now unopposed application is certified to the Commission for its decision without oral hearing. The record consists of the application, applicant's verified statements, and nine verified statements in support.

DISCUSSION AND FINDINGS

Global Medical Transportation Services, Inc. (applicant) seeks the initial right to provide paratransit service. Applicant has been engaged in exempt emergency medical ambulance transport since 2003. It operates a facility located at 2172 Community Drive, Bath, Northampton County. The facility consists of offices, various rooms, and a garage capable of housing ten vehicles. Communications consist of two-way radios and a landline telephone, with 24-hour availability through an answering service.

The vehicle fleet currently consists of a 2005 and two 2006 Ford E-250 vans. The vehicles are inspected and maintained daily. Service and preventative maintenance are performed by the local Ford dealer.

There are 12 driver/EMT's who have received thorough training and are certified by the Commonwealth of Pennsylvania. Prospective employees undergo background and license checks. Stacy D. Hoch-Steuer, the company's president, personally conducts the training. The drivers receive emergency ambulance training and are certified emergency medical technicians.

The applicant's balance sheet dated December 31, 2006 shows total current assets of \$37,061 and total assets of \$168,337. There are total liabilities of \$182,582 and owner's equity of -\$14,245. Though the owner's equity is a negative figure, it is due to a long term note which does not place the applicant in a precarious financial position.

The application is supported by six individuals and three health care facilities in the proposed area of service. All have attested to a need for transportation on a daily basis to and from various facilities.

The application was protested by Safecare Ambulance Service, Inc., t/a Network Ambulance Service and Suburban Emergency Medical Services. The protests were withdrawn upon restrictive amendments excluding service in selected areas of Northampton County.

We further advise the applicant of the obligation to become familiar with the requirements of 52 Pa. Code as applicable to the operation of a motor carrier as authorized by this grant of authority. Failure to comply with all applicable requirements may subject the carrier to penalties, including fines, suspension of operating rights or cancellation of authority. Title 52 of the Pennsylvania Code may be accessed at www.pacode.com.

After complete review of the record, we find:

1. Applicant seeks the initial right to provide paratransit service and the application was opposed by two carriers.
2. The protests were withdrawn upon restrictive amendment as set forth below.
3. The application is supported by nine parties giving support in the area of the application.
4. Applicant has the ability, equipment, and fitness necessary to render the service in the area as amended.
5. The evidence of record is sufficient to establish a necessity for the service, as amended.
6. Approval of the application, as amended and further modified, is necessary for the accommodation and convenience of the public; **THEREFORE,**

IT IS ORDERED:

1. That the application be and is hereby approved granting the following right:

To transport, as a common carrier, persons in paratransit service, from points in the counties of Carbon, Lehigh, Monroe, and Northampton, to points in Pennsylvania, and return:

Subject to the following conditions:

That no right, power or privilege is granted to originate service within the boroughs of West Easton and Wilson, and the township of Palmer, and that no right, power or privilege is granted to provide service to or from the Gracedale Facility in the Borough of Nazareth, all located in Northampton County.

IT IS FURTHER ORDERED: That the applicant shall not engage in any transportation authorized by this Order until the following is submitted to the Commission:

1. Form E, as evidence of bodily injury and property damage liability insurance.
2. A tariff establishing just and reasonable rates.

IT IS FURTHER ORDERED: That the authority granted herein, to the extent that it duplicates authority now held by or subsequently granted to the applicant, shall not be construed as conferring more than one operating right.

IT IS FURTHER ORDERED: That upon compliance with the requirements hereinbefore set forth, a certificate shall issue evidencing the Commission's approval of the right to operate as above determined.

IT IS FURTHER ORDERED: That in the event said applicant has not, on or before sixty (60) days from the date of the service of this order, complied with the requirements hereinbefore set forth, the application shall be dismissed without further proceedings.

BY THE COMMISSION,

James J. McNulty
Secretary

(SEAL)

ORDER ADOPTED: March 22, 2007

ORDER ENTERED: March 26, 2007