

PAGE, WOLFBERG & WIRTH LLC

ATTORNEYS & CONSULTANTS

ATTORNEYS

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1936-2004

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CHRISTINA M. MELLOTT ○
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RYAN S. STARK ○

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Δ MEMBER, NEW YORK BAR

CONSULTANTS

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CHRISTINA M. MELLOTT
cmellott@pwwemslaw.com

August 23, 2010

VIA CERTIFIED MAIL

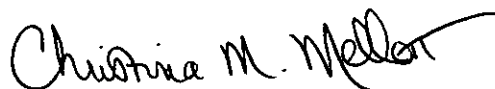
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for filing please find an original and three copies of the Protest and Request for Oral Hearing of the two Protestants: (1) Suburban Emergency Medical Services; and (2) Cetronia Ambulance Corps, Incorporated t/d/b/a Cetronia Ambulance Corps regarding the above-referenced Application. Kindly stamp the extra copy and return it in the enclosed envelope for our records. As evidenced by the attached Certificate of Service, this filing has been served on the Applicant's counsel pursuant to the Commission's rules and within the required time frame. Please let us know if you have any questions regarding this matter.

Very truly yours,



Christina M. Mellott
for PAGE, WOLFBERG & WIRTH, LLC

August 23, 2010
Page 2

CMM:ms
Enclosures

cc: David M. Hollar, Esquire – counsel for Applicant
Suburban Emergency Medical Services
Cetronia Ambulance Corps

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: APPLICATION OF :
UNITED MEDICAL : Docket No. A-2010-2189481
TRANSPORT LTD. :

PROTEST AND REQUEST FOR ORAL HEARING

In accordance with the Rules of Practice of the Pennsylvania Public Utility Commission, the two motor carriers: (1) Suburban Emergency Medical Services; and (2) Cetronia Ambulance Corps, Incorporated t/d/b/a Cetronia Ambulance Corps (hereinafter collectively referred to as "Protestants"), protest the above Application and request that the Application be assigned for oral hearing and in support thereof respectfully represent as follows:

1. By this Application, notice of which was published in the Pennsylvania Bulletin on August 14, 2010, United Medical Transport LTD. ("Applicant") seeks authority as set forth in Appendix A.

2. The name, address and telephone number of counsel for the two Protestants set forth in this Application is:

PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
(717) 691-0100

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3. The name, address and telephone number of the first of the two Protestants is:

SUBURBAN EMERGENCY MEDICAL SERVICES
3231 Freemansburg Avenue
Easton, PA 18045

(610) 253-0760

4. Protestant, Suburban Emergency Medical Services, holds authority from the Commission at Docket Number A-00118866, as follows:

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

A true and correct copy of Protestant, Suburban Emergency Medical Services' Certificate of Public Convenience is attached hereto as Appendix B.

5. The name, address and telephone number of the second of the two Protestants is:

CETRONIA AMBULANCE CORPS, INCCORPORATED
t/d/b/a CETRONIA AMBULANCE CORPS
7355 William Avenue
Allentown, PA 18106
(610) 398-0239

6. Protestant, Cetronia Ambulance Corps, Incorporated t/d/b/a Cetronia Ambulance Corps holds authority from the Commission at Docket Number A-00120701, as follows:

To transport, as a common carrier by motor vehicle, persons in paratransit service; between points in the counties of Lehigh, Northampton, Monroe and Carbon, and from points in said counties to points in the counties of Bucks and Berks, and return; and between points in the boroughs of Kutztown and Topton, Berks County, and the boroughs of Richland and Quakertown, Bucks County, and from points in said boroughs to points in the counties of Bucks, Berks, Lehigh, and Northampton, and return;

With the above right subject to the following conditions;

That no right, power or privilege is granted to originate service within the borough of Wilson and the township of Palmer, Northampton County;

That no right, power or privilege is granted to operate service from Gracedale County Home, in the borough of Nazareth, Northampton County, and Cedarbrook Fountain Hill Annex, in the borough of Fountain Hill, Lehigh County.

A true and correct copy of Protestant, Cetronia Ambulance Corps, Incorporated t/d/b/a Cetronia Ambulance Corps' Certificate of Public Convenience is attached hereto as Appendix C.

7. Approval of this Application is neither necessary nor proper for the service, accommodation, safety or convenience of the public since: (a) the Protestants presently hold authority to provide service in the area affected by the Application prior to any resolution of the Application; (b) the Protestants and other existing carriers are providing adequate service to the public in the areas involved in the Application; (c) there is no need for the service proposed by the Applicant and approval of the Application will result in the diversion from existing carriers of revenue necessary to sustain their existing operations; and (d) approval of the Application will adversely affect the Protestants and other existing carriers which have a substantial investment in facilities and equipment and are willing and able to provide service in the Application area.

8. Protestants request that the Application be set for oral hearing and that the Applicant be required to prove by competent evidence the elements of proof required by statute and regulation. If an oral hearing is held, the Protestants will appear and present evidence of each Protestant's own operations and particular interests unless this Application is amended so as to eliminate those interests as set forth in this Protest.

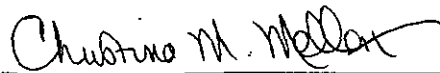
9. Pursuant to Section 333(c) of the Public Utility Code (66 Pa. C.S.A. § 333(c)), Protestants hereby request a list of witnesses expected to testify in the above-titled proceeding, together with the subject matter of their anticipated testimony, and, in particular, any complaints or any evidence pertaining to the service of either or both of the Protestants.

10. The Protestants know of no amendments that would satisfy their interests in this proceeding short of eliminating each Protestant's interests as set forth in this Protest.

WHEREFORE, Protestants, (1) Suburban Emergency Medical Services; and (2) Cetronia Ambulance Corps, Incorporated t/d/b/a Cetronia Ambulance Corps request that the granting of the Application be withheld; the proceeding be assigned for oral hearing with leave to the Protestants to participate fully therein or, alternatively, assigned to mediation with leave to the Protestant to participate fully therein; and that the Applicant be required to make available at any hearing competent witnesses for examination on all material and relevant facts bearing on the Application.

Respectfully submitted,

Dated: August 23, 2010



Christina M. Mellott, Esquire
Attorney I.D. No. 81369
PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
(717) 691-0100; (717) 691-1226 (fax)

Counsel for Protestants, Suburban Emergency
Medical Services and Cetronia Ambulance
Corps, Incorporated t/d/b/a Cetronia Ambulance
Corps

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APPENDIX A

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

A-2010-2189481. United Medical Transport LTD.
(P.O. Box 21028, Philadelphia, Philadelphia County,
PA 19114) – 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.
Attorney: David M. Hollar, Esquire, 8 Tower Bridge,
Suite 400, 161 Washington Street, Conshohocken, PA
19428.

**PENNSYLVANIA BULLETIN
VOLUME 40, NUMBER 33
AUGUST 14, 2010**

APPENDIX A

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PA PUBLIC UTILITY COMMISSION
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APPENDIX B



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

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JAN 10 2003

IN REPLY PLEASE
REFER TO OUR FILE

January 9, 2003

PAGE, WOLFBERG & WIRTH, LLC
A-00118866

CHRISTIE M MELLOTT ESQ
5010 EAST TRINDLE RD SUITE 202
MECHANICSBURG PA 17050

Application of Suburban Emergency Services,
a corporation of the Commonwealth of Pennsylvania

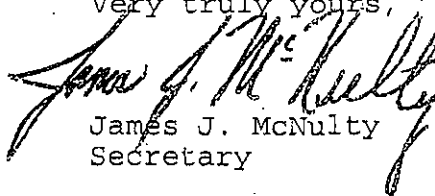
To Whom It May Concern:

The records of the Commission show that the applicant has complied with the necessary tariff and insurance requirements.

Enclosed, is the CERTIFICATE OF PUBLIC CONVENIENCE evidencing the Commission's approval of the right to operate.

Kindly attach the enclosures to the compliance order previously issued and mailed to you.

Very truly yours,


James J. McNulty
Secretary

Tab

SUBURBAN EMERGENCY MEDICAL SERVICES
3231 FREEMANSBURG AVE
EASTON PA 18045

CERTIFICATE SENT TO ATTORNEY

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

APPENDIX B

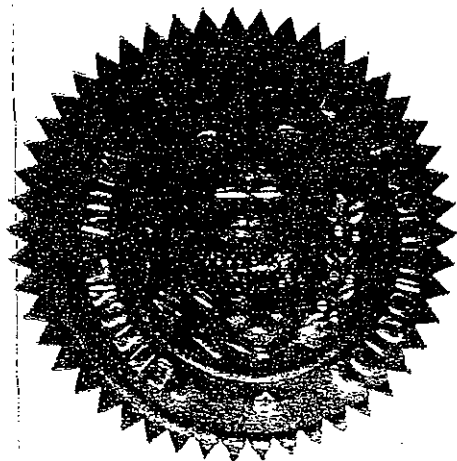
PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00118866

Suburban Emergency Medical Services

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 9th day of January, 2003.



James J. McKeely
Secretary

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

APPENDIX C



COMMONWEALTH OF PENNSYLVANIA
 PENNSYLVANIA PUBLIC UTILITY COMMISSION
 P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
 REFER TO THIS FILE

July 21, 2005

A-00120701

DOUGLAS M WOLFBERG ESQ
 PAGE WOLFBERG & WIRTH LLC
 5010 EAST TRINDLE ROAD
 MECHANICSBURG PA 17050

Application of Cetronia Ambulance Corps, Incorporated,
 t/d/b/a Cetronia Ambulance Corps

To Whom It May Concern:

The records of the Commission show that the applicant has complied with the necessary tariff and insurance requirements.

Enclosed, is the CERTIFICATE OF PUBLIC CONVENIENCE evidencing the Commission's approval of the right to operate.

Kindly attach the enclosures to the compliance order previously issued and mailed to you.

Very truly yours,

James P. McNulty
 James P. McNulty
 Secretary

Rpb

CETRONIA AMBULANCE CORPS INCORPORATED
 T/D/B/A CETRONIA AMBULANCE CORPS
 7355 WILLIAM AVENUE SUITE 700
 ALLENTOWN PA 18106-9397

CERTIFICATE SENT TO ATTORNEY

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PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

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APPENDIX C

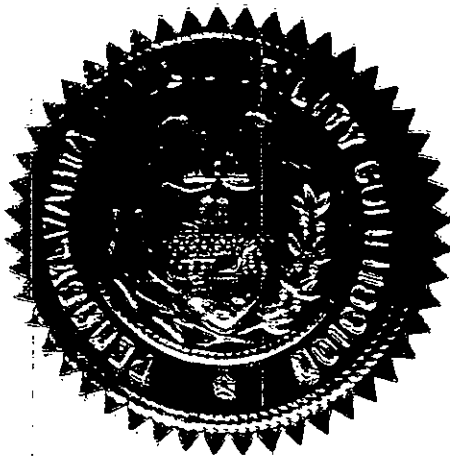
PA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION

IN THE MATTER OF THE APPLICATION OF: A-00120701

**Cetronia Ambulance Corps, Incorporated,
t/d/b/a Cetronia Ambulance Corps**

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval to operate.



In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this 21st day of July, 2005.

James J. McKeelty
Secretary

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Protest and Request for Oral Hearing upon the Applicant's counsel listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) and 1.55 (relating to service on attorneys):

VIA FIRST CLASS MAIL – CERTIFIED/RETURN RECEIPT REQUESTED

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



Christina M. Mellott
Attorney I.D. No. 81369
PAGE, WOLFBERG & WIRTH, LLC
5010 East Trindle Road, Suite 202
Mechanicsburg, PA 17050
(717) 691-0100; (717) 691-1226 (fax)

Counsel for Protestants, Suburban Emergency
Medical Services and Cetronia Ambulance
Corps, Incorporated t/d/b/a Cetronia Ambulance
Corps

Dated: August 23, 2010

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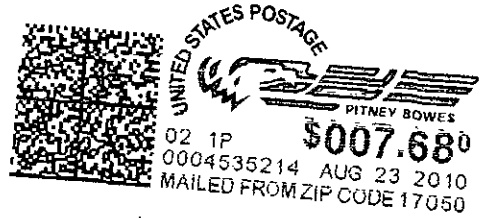
AUG 23 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Page, Wolfberg & Wirth, LLC
5010 East Trindle Road
Suite 202
Mechanicsburg, PA 17050



7009 2820 0001 5461 2654



FIRST CLASS MAIL

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265